IDAHO'S FY24-27 WIOA COMBINED STATE PLAN UNEMPLOYMENT INSURANCE PLAN

The Unemployment Insurance (UI) program requires a State Quality Service Plan (SQSP) on a 2year planning cycle that is a condition of receipt of administrative funding to administer the program. The SQSP is the State's UI performance management and planning process that allows for an exchange of information between Federal and State partners to enhance the UI program's ability to reflect their joint commitment to performance excellence and client-centered services. A formal two-year SQSP is submitted biennially. On the off years, States may be required to modify the SQSP with additional corrective action plans and narrative if they are failing any new performance measures, and they are required to provide updated budget documents, certifications, and assurances. ETA Handbook No. 336, 18th Edition provides detailed guidance for the preparation and submittal of the SQSP and supplemental guidance is provided in an annual UIPL, issued as UIPL 15-19 for the FY 2020 SQSP. The Social Security Act (SSA) sections 302 and 303 authorize the Secretary of Labor to provide funds to administer the UI program and govern the expenditure of those funds. States that choose the option to include UI in a WIOA Combined State Plan will be required to submit their SQSP through the Combined State Plan process. The SQSP must be prepared in accordance to the instructions in ET Handbook 336, 18th Edition and there are no changes to the established SQSP cycle if a State chose to submit their SQSP through the Combined State Plan process.

- (a) <u>Contents of a complete UI SQSP package</u>: A complete UI SQSP package includes the following documents, as described in Chapter 1, ETA Handbook 336, 18th Edition:
 - (1) *Transmittal Letter:* A cover letter to the appropriate Regional Office (RO) transmitting all the required SQSP documents.

See Idaho's SQSP Transmittal Letter on the following page.



November 3, 2023

Ms. Tamika Ledbetter Region 6 Administrator Employment and Training Administration United States Department of Labor 90 7th Street, Suite 17-300 San Francisco, CA 94103-1516

Dear Ms. Ledbetter.

Enclosed is the Idaho Department of Labor's Unemployment Insurance State Quality Service Plan for the fiscal year 2024.

If you have any questions, please contact JoAnna Henry at 208-332-3570 ext. 3146, joanna.henry@labor.idaho.gov.

Sincerely,

Jani Revier Director (2) *Budget Worksheets/Forms:* Budget worksheets/forms and plan for program administration based on projected allocations received from the Federal partner. These forms include Worksheet UI-1 and SF 424, SF 424A and SF 424B. The SF 424A is only required if the State vary the quarterly distribution of base claims activity staff years.

See Idaho's SF424 FY24 Bundle for its unemployment insurance grant on the following page.

OMB Number: 4040-0004 Expiration Date: 11/30/2025

Application for	Federal Assista	nce SF	-424		
*1. Type of Submiss Preapplication Application Changed/Corr		⊠ Ne	ew [Revision, select appropriate letter(s): Other (Specify):
* 3. Date Received: 09/18/2023		4. Appli	cant Identifier:		
5a. Federal Entity Id	lentifier:			5	5b. Federal Award Identifier:
State Use Only:					
6. Date Received by	/ State:		7. State Application I	den	entifier:
8. APPLICANT INF	ORMATION:				
* a. Legal Name:	EXECUTIVE OFFIC	E OF T	HE STATE OF IDAM	Ю,	, IDAHO DEPT OF LABOR
* b. Employer/Taxpa	ayer Identification Nun	nber (EIN	/TIN):	Ιr	* c. UEI: RX95DSJULDR9
d. Address:					
* Street1: Street2:	317 W MAIN ST				
* City: County/Parish:	BOISE				
* State: Province:	ID: Idaho				
* Country:	USA: UNITED S	TATES			
* Zip / Postal Code:					
e. Organizational	Unit:				
Department Name:	ENT OF LADOR			L	Division Name: UNEMPLOYMENT INSURANCE
f. Name and conta	ect information of pe	erson to	* First Name		carrie
Middle Name:		_			
* Last Name: PE' Suffix:	TERMAN				
Title: FINANCIAL	EXECUTIVE OFF	CER			
Organizational Affilia	ation:				
* Telephone Numbe	er: 208-332-3570	EXT 40)11		Fax Number:
	PETERMAN@LABOR.				

Application for Federal Assistance SF-424
* 9. Type of Applicant 1: Select Applicant Type:
A: State Government
Type of Applicant 2: Select Applicant Type:
Type of Applicant 3: Select Applicant Type:
* Other (specify):
* 10. Name of Federal Agency:
EMPLOYMENT AND TRAINING ADMINISTRATION
11. Catalog of Federal Domestic Assistance Number:
17.225
CFDA Title:
UNEMPLOYMENT INSURANCE
* 12. Funding Opportunity Number:
FY 2024 BASE ALLOCATIONS -ETA UIPL 13-23
* Title:
FISCAL YEAR (FY) 2024 STATE WORKFORCE AGENCY UNEMPLOYMENT INSURANCE (UI) RESOURCE PLANNING TARGETS AND GUIDELINES
13. Competition Identification Number:
ETA UIPL 13-23
Title:
FISCAL YEAR (FY) 2024 STATE WORKFORCE AGENCY UNEMPLOYMENT INSURANCE (UI) RESOURCE PLANNING TARGETS AND GUIDELINES
14. Areas Affected by Project (Cities, Counties, States, etc.):
Add Attachment Delete Attachment View Attachment
* 15. Descriptive Title of Applicant's Project:
UIPL 13-23 - FISCAL YEAR (FY) 2024 STATE WORKFORCE AGENCY UNEMPLOYMENT INSRUANCE (UI) RESOURCE PLANNING TARGETS AND GUIDELINES
Attach supporting documents as specified in agency instructions.
Add Attachments Delete Attachments View Attachments

Application for Federal Assistance SF-424
16. Congressional Districts Of:
* a. Applicant ID-002 * b. Program/Project ID-ALL
Attach an additional list of Program/Project Congressional Districts if needed.
Add Attachment Delete Attachment View Attachment
17. Proposed Project:
* a, Start Date: 10/01/2023 * b, End Date: 09/30/2026
18. Estimated Funding (\$):
* a. Federal 15,048,019.00
* b. Applicant
* c. State
* d. Local
* e. Other
*f. Program Income 15,048,019.00
*g. TOTAL 15,048,019.00
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?
a. This application was made available to the State under the Executive Order 12372 Process for review on
b. Program is subject to E.O. 12372 but has not been selected by the State for review.
C. Program is not covered by E.O. 12372.
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)
Yes No
If "Yes", provide explanation and attach
Add Attachment Delete Attachment View Attachment
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)
★ I AGREE
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency
specific instructions.
Authorized Representative:
Prefix: JANI JANI
Middle Name:
* Last Name: REVIER
Suffix:
* Title: DIRECTOR
* Telephone Number: 208-332-3570 EXT 3110 Fax Number: 208-334-6430
*Email: JANI.REVIER@LABOR.IDAHO.GOV
* Signature of Authorized Representative: * Date Signed: 11/3/202

View Burden Statement

BUDGET INFORMATION - Non-Construction Programs

OMB Number: 4040-0006 Expiration Date: 02/28/2025

SECTION A - BUDGET SUMMARY

5.	.4	ω	2			
Totals				FY 2024 BASE ALLOCATIONS-ETA UIPL 13-23 FY 2024 STATE WORKFORCE AGENCY UI RESOURCE PLANNING TARGET AND GUIDELINES	(a)	Grant Program Function or
				17.225	(b)	Catalog of Federal Domestic Assistance
\$ 15,048,019.00				\$ 15,048,019.00	Federal (c)	Estimated Unobligated Funds
\$				\$	Non-Federal (d)	gated Funds
\$				€	Federal (e)	
\$				€9	Non-Federal (f)	New or Revised Budget
\$ 15,048,019.00				\$ 15,048,019.00	Total (g)	

SECTION B - BUDGET CATEGORIES

Standard Farm 1911 (Bay 7 07)	Otopo	•			
₩		4	•	4	7. Program Income
	_				
\$ 15,048,019.00		€	↔	\$ 15,048,019.00	k. TOTALS (sum of 6i and 6j)
€					j. Indirect Charges
\$ 15,048,019.00				15,048,019.00	i. Total Direct Charges (sum of 6a-6h)
482,883.00				482,883.00	h. Other
					g. Construction
					f. Contractual
					e. Supplies
					d. Equipment
					c. Travel
4,692,700.00				4,692,700.00	b. Fringe Benefits
\$ 9,872,436.00		\$	\$	9,872,436.00	a. Personnel
				FY 2024 BASE ALLOCATIONS-ETA UIPL 13-23 FY 2024 STATE WORKFORCE AGENCY UI RESOURCE PLANNING TARGET AND GUIDELINES	
(5)			(2)	(1)	o. Object Class Categories
Total		UNCTION OR ACTIVITY	GRANT PROGRAM. FUNCTION		6 Object Class Categories

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Prescribed by OMB (Circular A -102) Page 1A

			SECTION (() - N	SECTION C - NON-FEDERAL RESOURCES	URC.	ES				
	(a) Grant Program				(b) Applicant		(c) State	<u> </u>	(d) Other Sources		(e)TOTALS
%	FY 2024 BASE ALLOCATIONS-ETA UIPL 13-23 FY 2024 STATE WORKFORCE AGENCY UI RESOURCE PLANNING TARGET AND GUIDELINES	Y 2024		↔	0.00	↔		₩		\$	0.00
'n											
10.											
. 1											
12. TC	TOTAL (sum of lines 8-11)			₩	0.00	↔		₩		↔	0.00
			SECTION D -	D - F	FORECASTED CASH NEEDS	NEE	:DS				
1	1	<u>, </u>	Total for 1st Year	• 	1st Quarter		2nd Quarter	•	3rd Quarter		4th Quarter
14. No	14. Non-Federal	↔									
15. TC	15. TOTAL (sum of lines 13 and 14)	↔	15,048,019.00	↔	3,762,004.00	↔	3,762,005.00	€	3,762,005.00	₩	3,762,005.00
	SECTION E - B	UDGE	BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT	DER/	L FUNDS NEEDED	FOR	BALANCE OF THE	PRC			
	(a) Grant Program				(h)First		FUTURE FUNDING PERIODS	굨	(d) Third		(a) Fourth
16. E	FY 2024 BASE ALLOCATIONS-ETA UIPL 13-23 FY 2024 STATE WORKFORCE AGENCY UI RESOURCE PLANNING TARGET AND GUIDELINES	Y 2024	STATE WORKFORCE	↔	0.00	₩		₩	0.00	↔	0.00
17.											
18.											
19.											
20. To	TOTAL (sum of lines 16 - 19)			↔	0.00	↔	0.00	€9	0.00	↔	0.00
			SECTION F	- OTI	OTHER BUDGET INFORMATION	AMA.	TION				
21. Di	21. Direct Charges:				22. Indirect Charges:	Cha	ges:				
23. Re	23. Remarks:										

OMB Number: 4040-0007 Expiration Date: 02/28/2025

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

- Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
- Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to:

 (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C.§§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation

- Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps: (d) the Age Discrimination Act of 1975, as amended (42 U. S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (i) the requirements of any other nondiscrimination statute(s) which may apply to the application.
- 7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

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- Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
- 10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
- Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

- 13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
- 14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
- 15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
- 16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- 17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
Jan 1	DIRECTOR
APPLICANT ORGANIZATION	DATE SUBMITTED
EXECUTIVE OFFICE OF THE STATE OF IDAHO, ID DEPT OF LABOR	11/6/2023

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(3) The State Plan Narrative: The State Plan Narrative is a vital element of the SQSP that provides a vehicle for sharing with the Federal partner State-specific efforts that affect the administration of the UI Program. The State Plan Narrative allows the State to describe in a single narrative: a) State performance in comparison to the Government Performance Review Act goals; b) actions planned to correct deficiencies regarding UI programs, UI program reviews and reporting requirements; and c) results of customer satisfaction surveys (optional).

See Idaho's FY24 SQSP Narrative Plan on the following page.

STATE QUALITY SERVICE PLAN

STATE PLAN NARRATIVE Addendum to FY 2023 Biennial SQSP

(Idaho – Fiscal Years 2023-2024)

A. Overview

1. State priorities and the strategic direction the state has adopted to ensure continuous improvement.

The Idaho Department of Labor's priorities for the Federal Fiscal Year (FFY) 2023-2024 SQSP include:

- a. The timely and accurate payment of UI benefits.
- b. An overall integrity goal of reducing the number of improper payments and the prevention, detection, and recovery of improper and fraudulent payments.
- c. Continuous business process analysis in all areas of UI to improve program performance with technology.
- d. Improve state capacity to administer and operate the UI program effectively and efficiently.
- e. To provide adjudication and claims processing performance that meets the standards established by USDOL.
- f. To assist and improve the timely reemployment of UI claimants with continued use of the Reemployment Services and Eligibility Assessment (RESEA) program.
- g. Annual and necessary interim training to enhance performance and quality.

Idaho's goals continue to align with national priorities for building UI program performance, paying benefits accurately and timely, ensuring equitable access, detecting and preventing improper payments, recovering overpayments, connecting claimants with re-employment services, and mitigating the likelihood and impact of fraud overall. Idaho is utilizing the resources and expertise identified through various grants and UIPL guidance to improve processes and promote equitable access to UI programs. Idaho is making progress in several areas.

Idaho is currently participating in the Tiger Team initiative and has been awarded funding for eight tiger team projects.

Behavioral Insights and Wage Calculator. We have begun work on this
project and are utilizing USDOL resources on this project. This project will
add a wage calculator to our continued claim filing process. We will also add

prompts from the Behavioral Insights toolkit to improve claimant compliance.

- SIDES adding three data exchanges and single sign-on.
- Robotic Processing Automation adding this technology for easier creation of Benefit Accuracy Measurement packets and potential other processes.
- Improving our phone system and tracking results.
- Updating our claimant portal.
- Creating a reports and operations dashboard.
- Optical Character Recognition routing of documents based on type, not requiring staff involvement.
- Banking information compared to Integrity Data Hub this will allow us to crossmatch claimant direct deposit banking information to catch duplicate accounts and prevent fraudulent payment activity.

Promoting equitable access to UI programs is also a priority for Idaho. Several projects have been completed or are in progress in this area.

- UI Navigators: Idaho hired an additional three navigators to aid customers needing help with the UI claims process in-person at remote locations throughout the state. We also have seven other navigators not funded by the equity grant that are available at our one-stop centers. Idaho conducted an outreach campaign to communicate the availability of our navigators and remote locations this past winter and will have a second campaign this coming winter.
- Plain Language Improvements: Idaho is in the process of reviewing all our communications materials. All the forms, UI determinations, and web sites will incorporate "plain language" to make things easier to understand for the average person. We are currently working with a contractor on customer feedback for the changes made. Once the changes are finalized, these materials will also be translated into Spanish.
- Texting: To provide more flexibility for our customers, Idaho is
 pursuing texting as an option for our claimants. Texting will allow us to better
 communicate with targeted messaging to do things like encourage claimants
 to submit their weekly certifications once the benefit week ends, resulting in
 faster payment, and reminding claimants chosen for RESEA of their
 upcoming interviews, and other helpful information. Texting will be available
 in Spanish.
- Additional Fact-finding: Idaho is beginning work on implementing additional fact-finding questions on our Claimant Portal and continued claims process.
 Idaho will begin with Failure to Provide Earnings and School Attendance issues generated when the claimant files the weekly certification, then will begin incorporating additional factfinding for other issues to streamline and accelerate the factfinding process. Issues will not be auto adjudicated and

- will still be reviewed by staff, but this will likely speed up the adjudicated issues.
- UI Video: Idaho has incorporated our unemployment insurance video into the claim filing process. The video is available in English and Spanish. Disposable headsets are also available for claimants who file in the office.
- Language Documentation and Handouts: Idaho has created Babel notices for customers who speak languages other than English and Spanish in their preferred language, providing details on how to get help. We have also created a flyer in multiple languages explaining their rights and responsibilities.
- Weekly Certification Optimization: Idaho started a process to automate processing of our paper continued claim reports. This will allow for faster payment of the claimant's weekly benefits.
- Technology Upgrades: Idaho provided 32 tablets to our remote offices for use by claimants unfamiliar with traditional personal computers.
- Screen Reader Accessibility: Idaho is in the beginning stages of an update to assist visually impaired claimants with the claim filing process by updating the website and claim filing software application to be compliant with accessible screen readers.
- 2. Assessment of past performance and expected future performance. Includes, at state discretion, a discussion of external factors that may have performance implications.

Idaho has six issues that are included in the FY2024 SQSP Corrective Action Plan(s). The root causes for the deficiencies in these areas are 1) staffing turnover and training, 2) system limitations, 3) Pandemic related workload. Idaho has several modernization projects in progress and expects to address the system limitations and data validation with those projects. Idaho is also working to fill vacancies and conduct standardized training for all staff. By the end of FFY 2024 many of the deficiencies will be corrected and continued monitoring will ensure Idaho remains within acceptable performance levels (APL). Specific plans to correct deficiencies are included in the FY2024 SQSP Quarterly Reporting Workbook.

Idaho has no adjudication or appeals backlog and is continuing to work through the BPC backlog. We recognize the need to better manage workload in light of lessons learned from the COVID-19 pandemic. We have a Tiger Team project planned to improve our claims application, simplifying processes in an effort to create less irrelevant issues. We have also worked through an Equity project to improve the terminology to plain language. We will also be working on a Tiger Team project to better track volume, route issues to adjudicators, and prepare reports for management.

Idaho recently analyzed claimant demographic data for disparate impact and found no issues. Our research team will regularly monitor this and provide reports to program staff. We also have many other equity projects in the works, those projects will be discussed in greater detail in further sections.

Idaho was awarded funding for three recent grant opportunities offered through the US Department of Labor – UI Integrity, IT modernization and Tiger Team opportunities. Implementing the projects under these grants will improve our IT infrastructure, detect, prevent and collect overpayments, and improve claimant experiences, timeliness and equity, all leading to increased performance.

Over the last two years, Idaho has spent a substantial amount of time in training claim intake and contact staff as well as adjudicators. Claim intake staff are now able to handle many non-separation issues and all adjudicators are able to handle more complex separation and non-separation issues. Staff have also attended NASWA sponsored training, including fraud training. Idaho has a contact center application to allow us to better manage phone calls during high volume work periods. As part of the Tiger Team initiatives, Idaho will be making further enhancements to our phone tree, including an update to our tracking mechanism to better determine why claimants call so we can better provide messaging or routing to solve those issues.

Idaho has been working closely with our Workforce Division on transitioning the RESEA to AJLA. This process will be completed later this year and will allow the agency to better track claimant outcomes to be eligible for outcome payments. It will also allow the Workforce team to utilize a single system when conducting the interview and providing/ tracking services. Idaho provides notice to all claimants of their work search requirements upon the filing of their claim. We allow for a range of job search activities to meet the work search requirements. We also have a process where claimants are referred to available job openings from our workforce system and if they fail to follow through, they are referred to the adjudication team for a potential failure to apply issue.

3. Coordination with other plans, including WIOA.

Idaho has continued their demand driven focus for Employment Services and WIOA. This has allowed Idaho to expand their footprint in the state. Idaho currently holds office hours in 8 office locations and over 25 mobile service delivery locations. This has allowed Idaho to provide services in many small communities and rural areas. Idaho continues to utilize lean processes to reduce inefficiencies and eliminate redundancies.

Due to the inclusive organizational structure of the Idaho Department of Labor, coordination within the department with other plans is a common practice. The department's Workforce Development Division administers the Employment

Services and youth WIOA. UI Adjudication and Claims Processing has been consolidated with UI Compliance into one UI division. These changes continue to enhance Idaho's ability to meet the employment needs of the employer and job seeker community. In addition, claimants are directed during the claims process to utilize the IDOL reemployment services offered in our 8 field offices and over 25 mobile service delivery locations located throughout the state.

The Idaho Department of Labor is the administrative entity for unemployment insurance, employment security and Labor Market Information, and is also the WIOA Youth service provider in each of the 8 One-Stop centers. Collaboration and connectivity is inherent and will ensure claimant access to the full array of services. Career center staff have the skills to provide a comprehensive One-Stop service orientation and assessment and are able to provide claimants with the information, tools and technology to build quality work search and career development plans. All RESEA claimants receive referral information for the Idaho WIOA Dislocated Worker program service provider. Career center staff are trained annually on Idaho One Stop partner programs and services and provide a warm handoff referral to RESEA claimants as appropriate.

As part of the initial RESEA interview, career center staff review job postings in Idaho's labor exchange system, IdahoWorks. Based on the claimant's skills and experience, appropriate job referrals are given to the claimant and the staff follow up with the employers to ensure claimants have applied for these job referrals as required. If no application has been submitted, career center staff provide unemployment insurance staff with a potential issue needing review.

B. Federal emphasis (GPRA goals)

1. State performance compared to the GPRA goals.

- a. Percent of Intrastate Payments Made Timely (87%) 94.33%
- b. Detection of Recoverable Overpayments (57.5%) 198.15%
- c. Employer Tax Liability Determinations Made Timely (90%) 80.11%

Idaho's performance exceeded the GPRA goals for the percent of intrastate payments made timely and the detection of recoverable overpayments. Idaho was below the GPRA goal for timely determinations of employer tax liability. The deficiency resulted from a combination of staffing and system-related issues.

2. Actions planned to achieve GPRA goals and targets.

Idaho's employer population increased during the Pandemic and continues to grow at a steady pace. Additionally, Idaho is taking a proactive approach to fictitious employer schemes which has resulted in slower processing of liability determinations as staff review applications and establish legitimacy. To combat

these issues, Idaho will employ a dual approach by increasing staffing and modernizing the employer tax application process. This approach will bring Idaho into compliance with the 90% GPRA goal.

C. Program Review Deficiencies

1. Causes for failures to conduct required reviews/activities, e.g., Benefit Payment Control, Internal Security, Benefit Accuracy Measure, and Tax Performance System.

Idaho conducted and participated in all required reviews. An external BAM review was conducted. There were no deficiencies identified. Idaho also conducted the required internal reviews. Deficiencies were identified through the TPS review that are addressed on the related CAP workbook.

2. Plans to conduct the reviews as required. Idaho plans to conduct all reviews as required.

D. Program Deficiencies

Plans to correct deficiencies identified through required program reviews, e.g., deficiencies identified during an internal security review.

Deficiencies were identified through internal reviews which required a CAP in the areas of tax quality, effective audit measures, detection of overpayments, data validation, and benefit accuracy measurement. The CAP details the plans to remedy the deficiencies in each area. In addition to the CAP milestones, Idaho is conducting continuous and ongoing training and quality reviews. This will ensure Idaho is able to sustain the quality of the program after the performance goals are met.

E. Reporting Deficiencies

Actions planned to correct reporting deficiencies. Reporting deficiencies are defined as missing reports, reports submitted late more than 50 percent of the time (7 of 12 months for monthly reports; 3 of 4 quarters for quarterly reports), and annual reports submitted late 3 consecutive years.

Changes to system functionality brought on by the Pandemic did create some challenges for Idaho's federal reporting. During FFY 2023, Idaho had delinquent reports and also made material changes to the ETA 227 reports. Amended reports have been submitted. Idaho will strive to submit timely reports in all areas during FFY 2024.

F. Customer Service Surveys (optional)

As part of the equity grant, the Department has contracted with a vendor for

claimant input on our plain language initiative and gathered input from claimant populations, including claimants where English is not their preferred language.

G. Other (e.g., approach to maintaining solvency, requests for technical assistance) Idaho has no requests for technical assistance at this time.

H. Assurances:

- a. Assurance of Equal Opportunity (EO).
- b. Assurance of Administrative Requirements and Allowable Cost Standards.
- c. Assurance of Management Systems, Reporting, and Recordkeeping.
- d. Assurance of Program Quality.
- e. Assurance on Use of Unobligated Funds.
- f. Assurance of Prohibition of Lobbying Costs (29 CFR Part 93).
- g. Drug-Free Workplace (29 CFR Part 98).
- h. Assurance of Contingency Planning.

Provide the most recent dates for the following:

Information Technology (IT)Contingency Plan Implemented:

March 2006

IT Contingency Plan Reviewed/Updated1:

Reviewed/updated annually, next scheduled review 4th quarter 2023

• IT Contingency Plan Tested2:

Most recent test conducted in September 2022

- i. Assurance of Conformity and Compliance.
- j. Assurance of Automated Information Systems Security.

Provide the most recent dates for the following:

• Risk Assessment Conducted3:

<u>In October 2021, the Idaho Department of Labor began a qualitative and quantitative</u> risk analysis. This is scheduled for completion in FY2024

System Security Plan Reviewed/Updated4:

A system security status review was planned and started in 2022; however, changes in personnel/staffing prevented completion at that time. The system security plan review is scheduled for completion during FY2024.

k. Assurance of Confidentiality

¹ At a minimum, an IT Contingency Plan must be reviewed and/or updated <u>annually</u>.

² At a minimum, an IT Contingency Plan must be tested annually.

³ At a minimum, a Risk Assessment should be conducted once every three (3) years.

⁴ At a minimum, a System Security Plan must be reviewed and/or updated annually.

(4) Corrective Action Plans (CAPs): CAPs are expected as a part of the SQSP when State's annual performance does not meet the established criteria for core measures, Secretary's Standards, UI program, assurances, and other program deficiencies identified in the annual SQSP guidance provided by the Department. The CAP must list both specific milestones for key corrective actions or improvement activities, and the completion date for each milestone.

See Idaho's FY24 SQSP Corrective Action Plan on the following page.

		Idaho				
	MEASURES/PROGRAMS TO BE AD	DRESSED FOR BIENNIA	L SQ	SP FIS	SCAL YEA	R (FY) 2023
	Measures/Programs to be Addressed (Each Measure Below is Hyperlinked to the CAP Worksheet)	Acceptable Level of Performance (ALP)	Corre	ective	Narrative Required (In Word Doc.)	SQSP 2023 Performance Year Data
	First Payment Promptness	≥ 87%				80.13%
В	First Payment Promptness (IntraState 14/21 Days)	≥ 87%				79.88%
E N	First Payment Promptness (InterState 14/21 Days)	≥ 70%				72.76%
E	First Payment Promptness (IntraState 35 Days)	≥ 93%				92.77%
F	First Payment Promptness (InterState 35 Days)	≥ 78%				88.25%
¦ [Nonmonetary Determination Timeliness	≥ 80%				63.53%
	Nonmonetary Determination Quality - Separations	≥ 75%				56.12%
Ī	Nonmonetary Determination Quality - Nonseps	≥ 75%				87.13%
Α	Lower Authority Appeals (30 Days)	≥ 60%				34.35%
P P	Lower Authority Appeals (45 Days)	≥ 80%				53.54%
	Average Age of Pending Lower Authority Appeals	≤ 30 days				12.2
4	Average Age of Pending Higher Authority Appeals	≤ 40 days				14.3
L F	Lower Authority Appeals Quality	≥ 80%				100.00%
_	New Employer Status Determinations Timelapse	≥ 70%				83.40%
Ī	Tax Quality (Part A)	No more than 3 tax functions failing TPS in a year				Pass
Δ.	Tax Quality (Part B)	The same tax function cannot fail for 3 consecutive years				Pass
ľ	TPS Sample Reviews	Pass				Pass
Ī	Effective Audit Measure	Pass 4 factors/score ≥ 7				Fall.
ı	mproper Payments Measure	< 10%				8.38%
N	Detection of Overpayments - 3 Year Measure	≥ 50% & ≤ 95%				110.66%
T E	Overpayment Recovery Measure	≥ 68%				65.42%
3	Data Validation - Benefits (All Submitted & Passing)	All Benefit Pops Submitted & Passing				Not Submitted: Populations 3, 4, 12
ĭ	Data Validation - Tax (All Submitted & Passing)	All Tax Pops Submitted & Passing				Fall: TPS 1-4
3	NDNH BAM Compliance	Pass				Pass
1	BAM Operations Compliant	Pass All M&P				Pass
	ncorrect Recording of Issue Detection Date	95%				Pass
	Incorrect Recording of Determination Date	95%				Pass
	UI Reporting Requirements	Pass				Fail
3	Percent of Intrastate Payments Made Timely	87%				79.88%
P R	Detection of Recoverable Overpayments	57.5%				163.53%
A	Percent of Employer Tax Liability Determinations Made Timely	90%				82.00%
	Integrity Action Plan (IAP) Top Three	Root Causes - Payment Integrity	/ Inforr	nation .	Act (PIIA) Yea	ar Data
	Monit	toring Findings/Audit Resolution	on			_

	Idaho				
MEASURES/PROGRAMS TO BE AD	DRESSED FOR ALTERNA	TE SQS	SP FIS	SCAL YE	AR (FY) 2024
Measures/Programs to be Addressed (Each Measure Below is Hyperlinked to the CAP Worksheet)	Acceptable Level of Performance (ALP)	Action I (CAP	Plan R	arrative equired In Word Doc.)	SQSP 2024 Performance Year Data
First Payment Promptness	≥ 87%				94.28%
First Payment Promptness (IntraState 14/21 Days)	≥ 87%				94.33%
First Payment Promptness (InterState 14/21 Days)	≥ 70%				92.16%
First Payment Promptness (IntraState 35 Days)	≥ 93%				98.63%
First Payment Promptness (InterState 35 Days)	≥ 78%				98.43%
Nonmonetary Determination Timeliness	≥ 80%				83.49%
Nonmonetary Determination Quality - Separations	≥ 75%				84.99%
Nonmonetary Determination Quality - Nonseps	≥ 75%				91.91%
Lower Authority Appeals (30 Days)	≥ 60%				94.05%
Lower Authority Appeals (45 Days)	≥ 80%				98.66%
Average Age of Pending Lower Authority Appeals	≤ 30 days				10.0
Average Age of Pending Higher Authority Appeals	≤ 40 days				11.1
Lower Authority Appeals Quality	≥ 80%				98.75%
New Employer Status Determinations Timelapse	≥ 70%				81.1%
Tax Quality (Part A)	No more than 3 tax functions failing TPS in a year				Fail:
Tax Quality (Part B)	The same tax function cannot fail for 3 consecutive years				Pass
TPS Sample Reviews	Pass				Pass
Effective Audit Measure	Pass 4 factors/score ≥ 7				Fail: Factor 1: 0.5% Factor 3: 0.6%
Improper Payments Measure	< 10%				8.11%
Detection of Overpayments - 3 Year Measure	≥ 50% & ≤ 95%				122.40%
Overpayment Recovery Measure	≥ 68%				54.34%
Data Validation - Benefits (All Submitted & Passing)	All Benefit Pops Submitted & Passing				Fail: Not Submit: Benefits 3 & 4; Module 3
Data Validation - Tax (All Submitted & Passing)	All Tax Pops Submitted & Passing				Fail: TPS 1-4
NDNH BAM Compliance	Pass				Pass
BAM Operations Compliant	Pass All M&P				Fail:
Incorrect Recording of Issue Detection Date	95%				97.05%
Incorrect Recording of Determination Date	95%				100.00%
UI Reporting Requirements	Pass				Fail
Percent of Intrastate Payments Made Timely	87%				94.33%
Detection of Recoverable Overpayments	57.5%				198.15%
Percent of Employer Tax Liability Determinations Made Timely	90%				80.11%
Integrity Action Plan (IAP) Top Thre	e Root Causes - Payment Integri	ty Inform	nation	Act (PIIA)	Year Data
Mor	nitoring Findings/Audit Resolution	on			

			Tax Quality			_					
Federal Fiscal Year: 2023-2	024 SQSP Corrective Action	Plan & Progress Report		Bac		Overview 20	23	Bac		e Overview 2	<u>024</u>
	State: Idaho	CAP Based on	State's		Federal Fisc				Federal Fisc		1
Performance Measures	ALP	01/01/2021 - 12/31/2021 Performance	Target/Actual Performance	12/31/2022 Quarter 1	3/31/2023 Quarter 2	6/30/2023 Quarter 3	9/30/2023 Quarter 4	12/31/2023 Quarter 1	3/31/2024 Quarter 2	6/30/2024 Quarter 3	9/30/202 Quarter 4
		Status New	Target Actual					Fail	Fail	Fail	Pass
	No more than 3 tax	Status Successor	Target Actual					Fail	Fail	Fail	Pass
Tax Quality (Part A)	functions failing TPS in a year	Report Delinquency	Target Actual					Fail	Fail	Pass	Pass
		Credit/Refunds	Target					Fail	Fail	Pass	Pass
egional Office Comments in cell below:			Actual								
he Summary must provide:		Correctiv	ve Action Plan S	ummary							
he root causes for the deficiencies in the tax ope rell as the Pandemic, resulted in a significant wor mitations of the current systems contribute to is. Provide a description of your "Plan-Do-Check-A usiness process analysis, training, implementing lan: Idaho continues to be understaffed in the tautstanding modernization projects, including neroic Idaho will focus on prevention of fictitious emodernization project that will enhance Idaho's a eviewed to determine where efficiencies can be heck: Regular progress meetings will ensure Idaho's at it. If any barriers are identified, actions will be training that it is the previous year, an explain od in thave a CAP in this area during FFY 2	rkload backlog and untimely sues on documentation and Act" corrective action plan w process improvements, means ax operations area. Efforts w w account registrations. aployer schemes and SUTA or biblity to follow up on deling made. no's resources are effectively aken to ensure all projects a lanation of why the actions or lanation of why the lanation of why the lanati	processing of backlog items. Ic timeliness. hich will be undertaken to achi asuring effectiveness, etc. Plea till be made to fill vacant position dumping through a proactive aguent accounts. Analysis of proc y utilized, both IT and subject in and initiatives are prioritized con	eve the accepta ase include a de- ons and provide oproach. A mode esses and proce matter experts. F. rrectly and to in	ble level of per scription of the standardized t ernization proj dures, specific tegular progre- form all stakeh	rformance. E ese actions/a raining for st ect is in the trailly those su ss and compenders of any	everal tax oper examples of m ctivities in each aff during 4th esting phases prounding doc etency checks y changes.	ajor actions a ch stage of yo quarter 2023 that will assi- cumentation, will ensure to	ms; however, t and activities; a cur "Plan-Do-Ch B. Idaho will als st in this area. I notifications, a raining is progr	ika, Milestone neck-Act" corn to focus effort idaho is also s and other corn essing as expi	es, include IT rective action ts on implementating a new respondence, ected.	equiremer plan. enting
A brief description of plans for monitoring and aho will conduct quality control reviews, in additions will ensure Idaho is able to meet minimun OTE: Enter an "X" in the box to the right if the dimaining to be taken in subsequent fiscal years anter Remaining Major Actions Here)	assessing accomplishment of ition to those required by the n tax operations ALPs. esired improvements will no	e TPS program, to identify area of the accomplished by the end of	of the two conse	ner training. Pe	erformance n	netrics have b				_	kload. The
. Credit/Refund: Analyze failure of TPS sample	le and investigate changes to	o policy and process automatio	Milestones on.							Complet	ion Date
tatus New: Review status of program moderniza tatus Successor: Identify requirements for mode eport Delinquency: analyze failure of TPS sample	rnization and develop a time	eline for implementation.		nplementation							/2023
taffing: Fill vacancies in tax operations. Y 2024 Quarter 1 Status Report (Quarter Ending	- 42 /24 /2022):										
Y 2024 Quarter 2 Status Report (Quarter Ending											
Y 2024 Quarter 3 Status Report (Quarter Ending	g 6/30/2024):										
Y 2024 Quarter 4 Status Report (Quarter Ending	g 9/30/2024):										
. Credit/Refund: Identify requirements for a tatus New: conduct additional requirements gatl tatus Successor: conduct additional requirement taffing: conduct training on tax operations and re	hering. Begin development a ts gathering. Begin developn	and system testing. Coordinate nent and system testing. Coord	changes with ta inate changes w	ıx validation ar vith tax data va	lidation and	581 report.	rds.				ion Date
Y 2024 Quarter 1 Status Report (Quarter Ending	g 12/31/2023):									3/31,	/2024
Y 2024 Quarter 2 Status Report (Quarter Ending	g 3/31/2024):										
Y 2024 Quarter 3 Status Report (Quarter Ending	z 6/30/2024):										
Y 2024 Quarter 4 Status Report (Quarter Ending											
. Credit/Refund: Implementation of automatic tatus New and Successor: Program modernizatio conduct quality control and staff competency revi	n and enhancements are in p									_	ion Date
7 2024 Quarter 1 Status Report (Quarter Ending										6/30,	/2024
Y 2024 Quarter 2 Status Report (Quarter Ending	z 3/31/2024):										
/ 2024 Quarter 3 Status Report (Quarter Ending											
/ 2024 Quarter 4 Status Report (Quarter Ending		h policy and TDS requirement	in all areas - D	orting started	ro in wla ··	at will all	Idaho to :	inuo to ===="	or progress:	Carried	ion Dete
Conduct quality control reviews and testing		n policy and TPS requirements	ııı aii areas. Keç	or ung structu	re iii piace th	iat Will allOW	udiiO to cont	ue to monito	progress in		ion Date /2024
7 2024 Quarter 1 Status Report (Quarter Ending	g 12/31/2023):										
Y 2024 Quarter 2 Status Report (Quarter Ending	g 3/31/2024):										

FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):

		dit Measure (EA	ivi) - Scor						I. 4 - Alt	. 0	004
Federal Fiscal Year: 2023-2024 SQSP Correctiv	e Action Plan & P	rogress Report			Federal Fisc	ol Vear 2022	23	Вас	Federal Fisca		024
State, tuano		CAP Based on	State's			6/30/2023	9/30/2023	42/24/2022		6/30/2024	0/20/2024
Performance Measures	ALP	01/01/2021 - 12/31/2021 Performance	Target/Actual Performance	12/31/2022 Quarter 1	3/31/2023 Quarter 2	6/30/2023 Quarter 3	9/30/2023 Quarter 4	12/31/2023 Quarter 1	3/31/2024 Quarter 2	Quarter 3	9/30/2024 Quarter 4
EAM - Factor 1 (Contributory Employers Audited)	Score ≥ 1		Target Actual					Pass	Fail	Pass	Pass
EAM - Factor 2 (Change in Total Wages from Audits)	Score ≥ 2		Target Actual					Pass	Pass	Pass	Pass
EAM - Factor 3 (Total Wages Audited)	Score ≥ 1		Target Actual					Pass	Fail	Pass	Pass
EAM - Factor 4 (Avg # of Misclassified Workers Detected per Audit)	Score ≥ 1		Target Actual					Pass	Pass	Pass	Pass
Effective Audit Measure Total Score	Score ≥ 7		Target Actual					Pass	Fail	Pass	Pass
Regional Office Comments in cell below:		•	-			-			-		
		Corrective	Action Plan Su	mmary							
The Summary must provide:		Corrective	ACCIOII FIAII Su	IIIIIai y							
for each factor and the EAM total score for calendar year 2023. B. Provide a description of your "Plan-Do-Check-Act" corrective action requirements, business process analysis, training, implementing proc action plan. Plan: Idaho has a proven training process that fully equips employees employees to contribute significantly to factors 1 and 3 during 2023. Do: Idaho will continue training through 2023 and 1st quarter 2024, a Check: Monthly meetings will be held with the audit program manage watch if barriers arise to Idaho's progress in these areas, those issues 2024 but will not establish milestones unless deficiencies are identified. If a plan was in place the previous year, an explanation of why the Idaho did not have a CAP in this area in FFY 2023. D. A brief description of plans for monitoring and assessing accomplisted and the seath of the provious year. The description of plans for monitoring of each factor and the EANOTE: Enter an "X" in the box to the right if the desired improvement remaining to be taken in subsequent fiscal years and include a project (Enter Remaining Major Actions Here)	ess improvements in the audit prograte which time 85% ement to determine illibrate and ed. actions contained thement of planned M total score. Que as will not be according to the contained as will n	a, measuring effectivener ram for their duties, alth of the employees in the le if Idaho is continuing d addressed immediatel in that plan were not su lactions and for control arterly meetings will ide mplished by the end of t	ess, etc. Pleas nough it takes e audit prograr to progress as y, whenever p uccessful in im ling quality affi ntify potential the two conse	e include a des a significant ar n will have rea expected tow ossible. Idaho proving perfor er achieving p issues to mee cutive fiscal ye	mount of time ached the end ward the factor has historica rmance; and, performance peting the ALP, ears for which	hese actions/a e to reach the d of the trainii or 1 and 3 ALP illy passed on an explanatic goals which can be	e end of that ng cycle. s. factors 2 and on of why the	program. Idah I 4. Idaho will a actions now s	o expects ma monitor those specified will l	Check-Act" co	yly hired ghout FFY essful
Idaho passes factors 1-4 and total EAM for calendar year 2023.										Complet 12/31	ion Date /2023
FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023): FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024): FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024): FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):											
2. Idaho passes factors 2 and 4. Idaho provides additional advance	ed audit training fo	or staff.								Complet 3/31,	ion Date '2024
FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):											
FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):											
FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):											
FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):											
3. Idaho passes factors 1-4 on an ongoing basis.											ion Date /2024
FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):											
FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):											
FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):											
FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):											
Idaho remains on track to pass factors 1-4 and total EAM for cal	endar year 2024.									Complet 9/30/	ion Date
FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):										3/30/	2024

FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):

FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):

FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):

			n of Overp		dian of	10	22		k to Alt-	Over-the Co	124
Federal Fiscal Year: 2023-2024 SQSP Correct		rogress Report		<u>Ba</u>	ck to Biennia		<u>)23</u>	Bac	k to Alternate		124
State: Idah	0	CAP Based on	State's			al Year 2023			Federal Fisca	T	1
Performance Measures	ALP	04/01/2021 - 03/31/2022 Performance	Target/Actual Performance	12/31/2022 Quarter 1	3/31/2023 Quarter 2	6/30/2023 Quarter 3	9/30/2023 Quarter 4	12/31/2023 Quarter 1	3/31/2024 Quarter 2	6/30/2024 Quarter 3	9/30/20 Quarter
etection of Overpayments - Core Measure - ≥50% & ≤95% of etectable/Recoverable Ops are Established for Recovery	≥ 50% & ≤ 95%	110.66%	Target Actual	≤ 95% 94.33%	≤ 95% 94.62%	≤ 95% 95.68%	≤ 95%	≤ 95%	≤ 95%	≤ 95%	≤ 95%
gional Office Comments in cell below:	•						•		•		
		Corrective	e Action Plan	Summary							
e Summary must provide:											
The Reason for the deficiency. The deficiency in this area was related to Idaho's 227 reporting. Signought the detection of overpayments into an acceptable range. Provide a description of your "Plan-Do-Check-Act" corrective actives actives process analysis, training, implementing process improver	ion plan which will l	oe undertaken to achiev	ve the accepta	ble level of pe	rformance. E	xamples of m	ajor actions a	nd activities; ak	a, Milestones	, include IT re	quireme
an: Idaho will continue to monitor the detection of overpayment b: If there is a more than 5% change from the previous quarter, or the quarterly CAP. leck: Idaho will implement reporting that will allow for timely mo	r if Idaho falls more			the quarterly o	letection of o	verpayment p	percentage, Id	aho will investi	gate the cause	e and address	those is:
tt: If progress is not made as expected on any specific milestone, I				e what change	s can be mad	e to meet mi	lestones.				
ternate Year Plan Updates If a plan was in place the previous year, an explanation of why th is item was a CAP in the prior year. At that time, Idaho was inves' gular monitoring will help ensure Idaho remains within acceptabl	tigating 227 reporti										
A brief description of plans for monitoring and assessing accomp	lishment of planne										
onthly progress checks will be conducted to ensure Idaho remain OTE: Enter an "X" in the box to the right if the desired improveme be taken in subsequent fiscal years and include a projected comp	ents will not be acco	mplished by the end of	f the two conse	ecutive fiscal y	· -				•	=	
			Milestones								
A team with subject matter experts will research and analyze	e the 227 report to	identify any reporting d	discrepancies.	BAM Supervise	or will audit c	ases to verify	all coding is c	orrect		Complet 3/31	/2023
	ince per month to a	ddress 227 report discr	repancies. It is	unknown whe	ther the 227 i	s affecting th	e detection of	f overpayment i	numbers.		
7 2023 Quarter 2 Status Report (Quarter Ending 3/31/2023): the subject matter experts have researched the 227 reporting error 7 2023 Quarter 3 status report (Quarter Ending 6/30/2023): the 227 anomalies and discrepancies have been resolved. Amender 7 2023 Quarter 4 Status Report (Quarter Ending 9/30/2023):	rs and continue to v	work on resolving the is:	sues. The BAN	1 supervisor ha	is sampled an	d reviewed ca	ases to ensure	coding is corre	ct. Milestone		ill be
7 2023 Quarter 2 Status Report (Quarter Ending 3/31/2023): ne subject matter experts have researched the 227 reporting error 7 2023 Quarter 3 status report (Quarter Ending 6/30/2023): ne 227 anomalies and discrepancies have been resolved. Amender 7 2023 Quarter 4 Status Report (Quarter Ending 9/30/2023): iilestone complete	rs and continue to v	work on resolving the iss	ssues. The BAN 9-30-23. Idaho	1 supervisor ha	is sampled an	d reviewed ca	ases to ensure	coding is corre	ct. Milestone	vestigation w	ion Date
f 2023 Quarter 2 Status Report (Quarter Ending 3/31/2023): ne subject matter experts have researched the 227 reporting erro f 2023 Quarter 3 status report (Quarter Ending 6/30/2023): ne 227 anomalies and discrepancies have been resolved. Amender f 2023 Quarter 4 Status Report (Quarter Ending 9/30/2023): itiliestone complete If anomalies in the 227 report are identified, resources will be	rs and continue to v	work on resolving the iss	ssues. The BAN 9-30-23. Idaho	1 supervisor ha	is sampled an	d reviewed ca	ases to ensure	coding is corre	ct. Milestone	vestigation w	
2023 Quarter 2 Status Report (Quarter Ending 3/31/2023): the subject matter experts have researched the 227 reporting error 2023 Quarter 3 status report (Quarter Ending 6/30/2023): the 227 anomalies and discrepancies have been resolved. Amender 2023 Quarter 4 Status Report (Quarter Ending 9/30/2023): tilestone complete If anomalies in the 227 report are identified, resources will be 2023 Quarter 1 Status Report (Quarter Ending 12/31/2022): tot due yet	rs and continue to v	work on resolving the iss	ssues. The BAN 9-30-23. Idaho	1 supervisor ha	is sampled an	d reviewed ca	ases to ensure	coding is corre	ct. Milestone	vestigation w	ion Date
2023 Quarter 2 Status Report (Quarter Ending 3/31/2023): e subject matter experts have researched the 227 reporting erro 2023 Quarter 3 status report (Quarter Ending 6/30/2023): e 227 anomalies and discrepancies have been resolved. Amende 2023 Quarter 4 Status Report (Quarter Ending 9/30/2023): illestone complete If anomalies in the 227 report are identified, resources will b 2023 Quarter 1 Status Report (Quarter Ending 12/31/2022): bt due yet 2023 Quarter 2 Status Report (Quarter Ending 3/31/2023):	rs and continue to v	work on resolving the issted to be complete by 9	9-30-23. Idaho	doesn't expec	is sampled an	d reviewed ca	ases to ensure	coding is corre	ct. Milestone	vestigation w	ion Date
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FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):
FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):

		Benefits	Data Val	idation							
Federal Fiscal Year: 2023-2024 SQSP Correcti	Back to Biennial Overview 2023				Back to Alternate Overview 2024						
State: Idaho				Federal Fiscal Year 2023				Federal Fiscal Year 2024			
Performance Measures	ALP	CAP Based on Validation Year 2022 4/1/2021- 3/31/2022 Performance	State's Target/Actual Performance	12/31/2022 Quarter 1	3/31/2023 Quarter 2	6/30/2023 Quarter 3	9/30/2023 Quarter 4	12/31/2023 Quarter 1	3/31/2024 Quarter 2	6/30/2024 Quarter 3	9/30/2024 Quarter 4
Data Validation Benefits - All Submitted and Passing		Population 3	Target	Fail	Fail	Fail	Fail	Fail	Pass	Pass	Pass
			Actual	Fail	Fail	Fail	Fail				
	Submitted &	Population 4	Target	Fail	Fail	Fail	Fail	Fail	Pass	Pass	Pass
	Passing		Actual	Fail	Fail	Fail	Fail				
		Mod 3 Benefits	Target					Fail	Fail	Fail	Pass
			Actual								
Regional Office Comments in cell below:											
		Corrective	Action Plan S	Summary							
The Summary must provide:											
A. The Reason for the deficiency.											
System changes and modernization projects have not included resou	rces to address da	ta validation with the n	nodernization	projects. Limite	ed programm	er time has be	en the main	factor Idaho's o	delay in addre	ssing data val	idation
concerns.											
B. Provide a description of your "Plan-Do-Check-Act" corrective action	n plan which will b	e undertaken to achiev	e the acceptab	le level of perf	formance. Ex	amples of ma	jor actions an	d activities; aka	a, Milestones,	include IT red	quirements,
	_	fectiveness, etc. Pleas			/			IIDI D - CI	1 4 10		1

will be incorporated into future validation and production timelines.

Check: As populations and modules pass, the associated reports will be updated to provide "real time" monitoring and analysis of populations.

ct: Modules and nonulations will be check at least quarterly to ensure continue validat

C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful. Mod 3 was not on a previous CAP

opulations 3 and 4 have been on previous CAP. IT resources were allocated to pandemic related issues and required modernization projects in previous years, which resulted in a continued CAP on data validation. Idaho is committed to data validation and ensuring all benefit populations are passing. Idaho does not expect to have a continued CAP in this area after FFY 2024.

D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.

A data validation team will meet to review progress during and after modernization efforts are complete on at least a quarterly basis.

daho will continue to monitor passing data validation populations and modules. If failures in a population/module is identified, Idaho will take actions to resolve any issues before the due date of the next population/mod NOTE: Enter an "X" in the box to the right if the desired improvements will not be accomplished by the end of the two consecutive fiscal years for which this plan is in effect. Summarize, below, the major actions

remaining to be taken in subsequent fiscal years and include a projected completion date as to when the performance goal will be achieved.

	Milestones				
	1. Population 12: Identify the quarter in which it began to fail and identify the cause of the failure.				

FY 2023 Quarter 1 Status Report (Quarter Ending 12/31/2022):

opulation 12 continues to fail. The population began to fail 3rd quarter 2020; however, the cause of the failure has not been identified. Resources were devoted to the final stages of deploying a tax modernization project. Work in this FY 2023 Quarter 2 Status Report (Quarter Ending 3/31/2023):

opulation 12 is passing. Milestone complete

FY 2023 Quarter 3 status report (Quarter Ending 6/30/2023):

Ailestone complete

FY 2023 Quarter 4 Status Report (Quarter Ending 9/30/2023):

Milestone complete, population 12 no longer on CAI

Completion Date Population 12: Assess and resolve population 12 discrepancies related to the ETA 227. Population 12 passes. 6/30/2023

FY 2023 Quarter 1 Status Report (Quarter Ending 12/31/2022):

FY 2023 Quarter 2 Status Report (Quarter Ending 3/31/2023):

opulation 12 is passing. Milestone complete

FY 2023 Quarter 3 status report (Quarter Ending 6/30/2023):

Milestone complete

FY 2023 Quarter 4 Status Report (Quarter Ending 9/30/2023):

Ailestone complete, population 12 not included on the FFY 2024 CAP workbook

Assess and resolve population 4 discrepancies related to the ETA 5159, 586, 9050, and 9051. Population 4 passes.				
3. Assess and resorte population + discrepancies related to the ETA 3137, 360, 7030, and 7031. Topulation + passes.	3/31/2024			
FY 2023 Quarter 1 Status Report (Quarter Ending 12/31/2022): Not due yet				
FY 2023 Quarter 2 Status Report (Quarter Ending 3/31/2023): Not due yet				

FY 2023 Quarter 3 Status Report (Quarter Ending 6/30/2023): Not due yet FY 2023 Quarter 4 Status Report (Quarter Ending 9/30/2023): Not due yet

FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):

FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):

FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):

FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):

Assess and resolve population 3 discrepancies related to the ETA 5159, 218, and 586. Population 3 passes.

Completion Date 3/31/2024 FY 2023 Quarter 1 Status Report (Quarter Ending 12/31/2022): Not due yet

FY 2023 Quarter 2 Status Report (Quarter Ending 3/31/2023): Not due yet

FY 2023 Quarter 3 Status Report (Quarter Ending 6/30/2023): Not due yet

FY 2023 Quarter 4 Status Report (Quarter Ending 9/30/2023): Not due vet FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):

FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):

FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024): FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):

Completion Date Assess reasons for Mod 3 failures 6/30/2024

FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):

FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):

FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):

FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):

Completion Date Resolve Mod 3 discrepancies. Mod 3 passes 9/30/2024

FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):

FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024): Y 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):

FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):

Tax Data Validation												
Federal Fiscal Year: 2023-2024 SQSP Corrective Action Plan & Progress Report					Back to Biennial Overview 2023				Back to Alternate Overview 2024			
State: Idaho					Federal Fiscal Year 2023				Federal Fiscal Year 2024			
Performance Measures	ALP	CAP Based on Validation Year 2022 4/1/2021 - 3/31/2022 Performance	State's Target/Actual Performance	12/31/2022 Quarter 1	3/31/2023 Quarter 2	6/30/2023 Quarter 3	9/30/2023 Quarter 4	12/31/2023 Quarter 1	3/31/2024 Quarter 2	6/30/2024 Quarter 3	9/30/2024 Quarter 4	
		Population 2	Target	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Pass	
			Actual	Fail	Fail	Fail	Fail					
		Mod 3 Tax	Target					Fail	Fail	Fail	Pass	
			Actual									
		Mod 4 Status New	Target	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Pass	
	Submitted &		Actual	Fail	Fail	Fail	Fail					
Data Validation Tax - All Submitted and Passing	Passing	Mod 4 Successor	Target	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Pass	
	rassing		Actual	Fail	Fail	Fail	Fail					
		Mod 4 Inactive/Terminate	Target	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Pass	
			Actual	Fail	Fail	Fail	Fail					
		Mod 4 Field Audit	Target	Fail	Fail	Fail	Fail	Fail	Fail	Fail	Pass	
			Actual	Fail	Fail	Fail	Fail					
Regional Office Comments in cell helow												

Corrective Action Plan Summary

The Summary must provide:

A. The Reason for the deficiency.

The extracts for the tax populations have not been created due to continuing work on the remaining Benefits data validation populations and a focus on modernization of the tax systems. The tax system has been modernized and is currently in the testing phase. Because of the new system, no expenditure of the limited resources was made to validate against the outgoing system.

B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities: aka. Milestones. include IT requirements. business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.

Plan: Modernization of the tax systems is currently entering phase 1 testing and is expected to be ready for the full production environment during 1st quarter 2024.

Do: The modernization efforts include work on data validation. Upon phase 1 release of the modernized tax system, Idaho expects all tax populations to be a point of focus. Since the tax system isn't expected until 1st quarter 2024, daho expects to continue failing these populations until that time.

Check: A team will be created with relevant stakeholders to review and monitor progress of the data validation efforts as part of the overall modernization. After deployment of the tax system, dedicated staff will continue to review he progress of the populations, at minimum on a quarterly basis.

Act: The team will analyze and develon resolutions to any issues affecting data validation during and after the tax system are placed into production

C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful. A CAP was in place in this area in FFY 2023. During the previous three years, Idaho continued to recover from the effects of the Pandemic. Idaho is also involved in a significant tax modernization project, both requiring significant resources. Data validation is part of the current overall modernization project. Idaho expects to complete the initial phase of the tax modernization during 1st quarter 2024. At that time, the extracts will be run and efforts focused on ensuring data validation of tax populations and modules. During FFY 2024 Idaho commits to ongoing resources to address data validation. In an effort to utilize resources as efficiently as possible, Idaho will remain committed to passing all benefit populations and modules before devoting the resources to tax populations and modules

Alternate Year Plan Updates

D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.

A data validation team will meet to review progress during and after modernization efforts are complete, at minimum on a quarterly basis. This team will take responsibility for identifying and resolving any ongoing concerns after goals

NOTE: Enter an "X" in the box to the right if the desired improvements will not be accomplished by the end of the two consecutive fiscal years for which this plan is in effect. Summarize, below, the major actions remaining to be taken in subsequent fiscal years and include a projected completion date as to when the performance goal will be achieved.

A data validation team will be assembled to include stakeholders from IT, Data Validation, and Management. This team will meet quarterly beginning 1st quarter 2024. The team will identify what is **Completion Date** needed to complete the tax data validation on all modules and populations. Each module and population will be prioritized with work commencing on the highest priority item in 2nd quarter 2023. 3/31/2024

FY 2023 Quarter 1 Status Report (Quarter Ending 12/31/2022):

Not due vet

FY 2023 Quarter 2 Status Report (Quarter Ending 3/31/2023):

The data validation team did not meet this quarter. All efforts were focused on Benefits Population 12 and the 227 reporting errors. The team is expected to meet during 2nd quarter 2023. The completion date for this milestone has

FY 2023 Quarter 3 status report (Quarter Ending 6/30/2023):

he data validation team met and discussed the failing populations. The focus of efforts this quarter were on benefit populations and the 227 reporting issues. The completion date for the benefit populations is projected for 3-31-24. The focus of IT efforts will be on benefit populations until all are passing. The projected deadlines for tax populations has been modified to begin upon completion of the benefit populations.

FY 2023 Quarter 4 Status Report (Quarter Ending 9/30/2023):

Not due yet. Milestone date has been updated to correspond with the projected date for completion of phase 1 of the tax modernization project.

FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):

FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024): FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):

FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):

IT resources dedicated to address issues identified with data validation for all modules and populations. For Module 4, all parts will be validated, including verification of the TPS selection methodology with the exception of the population validation.

Completion Date 6/30/2024

FY 2023 Quarter 1 Status Report (Quarter Ending 12/31/2022): Not due yet

FY 2023 Quarter 2 Status Report (Quarter Ending 3/31/2023): Not due yet

FY 2023 Quarter 3 Status Report (Quarter Ending 6/30/2023): Not due yet

FY 2023 Quarter 4 Status Report (Quarter Ending 9/30/2023): Not due yet FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):

FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):

FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024): FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):

For validation of population 1 - 5, the data validation team review the readiness of the new tax system, the 581 report, and the population extract process,

Completion Date 6/30/2024

FY 2023 Quarter 1 Status Report (Quarter Ending 12/31/2022): Not due yet

FY 2023 Quarter 2 Status Report (Quarter Ending 3/31/2023): Not due vet

FY 2023 Quarter 3 Status Report (Quarter Ending 6/30/2023): Not due vet

FY 2023 Quarter 4 Status Report (Quarter Ending 9/30/2023): Not due yet

FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023): FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):

FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024): FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):

Populations are passing and failures are analyzed, resolved, and resubmitted.

Completion Date 9/30/2024

FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023)

FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):

FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):

FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):

Benefit Accuracy Measurement (BAM)												
Federal Fiscal Year: 2023-2024 SQSP Corrective Action Plan & Progress Report			Back to Biennial Overview 2023				Back to Alternate Overview 2024					
State: Idaho			Federal Fiscal Year 2023				Federal Fiscal Year 2024					
Performance Measures	ALP	CAP Based on 2022 BAM Annual Determination Letter	State's Target/Actual Performance	12/31/2022 Quarter 1	3/31/2023 Quarter 2	6/30/2023 Quarter 3	9/30/2023 Quarter 4	12/31/2023 Quarter 1	3/31/2024 Quarter 2	6/30/2024 Quarter 3	9/30/2024 Quarter 4	
BAM Operations Compliant - Monetary Comparison Reports	± 15%		Target Actual					± 50%	± 50%	± 50%	± 15%	
BAM Operations Compliant - Separation Comparison Reports	± 15%		Target Actual					± 15%	± 15%	± 15%	± 15%	
BAM Operations Compliant - Nonseparation Comparison Reports	± 15%		Target Actual					± 15%	± 15%	± 15%	± 15%	
Regional Office Comments in cell below:												
The Summary must provide:		Correcti	ive Action Plan S	ummary								
B. Provide a description of your "Plan-Do-Check-Act" corrective action requirements, business process analysis, training, implementing proceation plan. Plan: Idaho will coordinate the CAP for monetary comparison reports allowable variance. Do: The Integrity taskforce will monitor the progress during monthly on target to meet them. Check: Idaho will monitor the separation and non separation comparallowable limits for both areas. Act: Once within allowable limits for the monetary comparison report addressed as soon as possible. C. If a plan was in place the previous year, an explanation of why the individual control of plans for monitoring and assessing accomplise.	ago and the change in data structure at that time. Idaho has been within allowable limits on the separation and non separation comparison reports. B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan. Plan: Idaho will coordinate the CAP for monetary comparison reports with data validation for population 3. As related populations and reports are changed or updated, Idaho will monitor for progress in moving closer to the allowable variance. Do: The Integrity taskforce will monitor the progress during monthly meetings to ensure Idaho is making progress and coordinating with the data validation team. The taskforce will also monitor milestones to ensure Idaho remains on target to meet them. Check: Idaho will monitor the separation and non separation comparison reports to ensure they remain within allowable limits. Milestones have not been established in this CAP for these areas because Idaho is currently within allowable limits for both areas. Act: Once within allowable limits for the monetary comparison reports, Idaho will continue to monitor on the same schedule as the separation and non separation reports. Any variance outside allowable limits will be analyzed and addressed as soon as possible. C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful A CAP was not in place during FFY 2023 D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals Id											
(Enter Remaining Major Actions Here)										'		
1 Deview and applying homeful applying 2 failures			Milestones							Complet	tion Date	
Review and analyze benefit population 3 failures. EV 2024 Quarter 1 Status Penert (Quarter Ending 12/21/2023): Output Propert (Quarter Ending 12/21/2										12/31	/2023	
FY 2024 Quarter 1 Status Report (Quarter Ending 1/31/2023): FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024): FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024): FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):												
2. IT and data validation resources correct and test population 3 c	hanges/update	es. Population 3 passes.		_							zion Date /2024	
FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):												
FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):												
FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):												
FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):												
Analyze other contributing factors to the BAM variance report t	o determine a	ny other potential caus	es for variances	outside allowa	ble limits. IT r	esources allo	cated to mak	ing necessary a	djustments.		ion Date /2024	
FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):												
FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):												
FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):												
FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):												

IT related changes are tested and verified. BAM monetary variance is within allowable limits. Reports are in place that will allow Idaho to monitor variance in all areas - monetary, non-monetary, and

FY 2024 Quarter 1 Status Report (Quarter Ending 12/31/2023):

FY 2024 Quarter 2 Status Report (Quarter Ending 3/31/2024):

FY 2024 Quarter 3 Status Report (Quarter Ending 6/30/2024):

FY 2024 Quarter 4 Status Report (Quarter Ending 9/30/2024):

Completion Date 9/30/2024 (5) *UI Program Integrity Action Plan (UI IAP):* The UI IAP outlines the strategies the State will undertake during the planning period regarding the prevention reduction and recovery of UI improper payments.

See Idaho's FY24 SQSP Integrity Action Plan on the following page.

State Quality Service Plan (SQSP) Integrity Action Plan (IAP)

Idaho – Fiscal Year (FY) 2024

Accountable Agency Official(s).

List the person or persons accountable for ensuring integrity in the state's unemployment insurance (UI) program.

Name: Jani Revier Title: Director

Email: Jani.Revier@labor.idaho.gov

Phone: (208) 332-3570 ext. 3110

*Note: Unemployment Insurance Program Letter (UIPL) No. <u>09-23</u>, issued on June 30, 2023, makes reference to UIPL No. 22-21, Change 2, throughout the guidance. However, on July 13, 2023, the Employment and Training Administration (ETA) issued UIPL No. <u>10-23</u>, which rescinded UIPL No. 22-21, Change 2. UIPL No. <u>11-23</u>, also issued on July 13, 2023, changed the amount of the integrity grant funding originally issued under UIPL No. 22-21, Change 2, but maintained the guidance on required and recommended fraud prevention and detection and overpayment recovery activities.

- (Topic #1: National Priority) Ensuring UI program integrity by assessing and evaluating fraud risks, implementing and maintaining sufficient controls to effectively mitigate the likelihood and impact of fraud, and reducing improper payments.
 - In evaluating fraud risks, states should consider both eligibility fraud risks and identity (ID) fraud risks.
 - State plans to evaluate UI fraud risks and implement and maintain sufficient controls to effectively prevent fraud and reduce improper payments, including state actions to develop their own state-specific antifraud strategy.
 - Key elements of an antifraud strategy include:
 - Who is responsible for fraud risk management activities?
 - Establish roles and responsibilities of those involved in fraud risk management activities, such as the antifraud entity and external parties responsible for fraud controls, and communicate the role of the Office of Inspector General (OIG) to investigate potential fraud.
 - What is the program doing to manage fraud risk?
 - O Describe the program's activities for preventing, detecting, and responding to fraud, as well as monitoring and evaluation.
 - When is the program implementing fraud risk management activities?
 - Create timelines for implementing fraud risk management activities, as appropriate, including monitoring and evaluations.

- Where is the program focusing its fraud risk management activities?
 - O Demonstrate links to the highest internal and external residual fraud risks outlined in the fraud risk profile.
- Why is fraud risk management important?
 - o Communicate the antifraud strategy to employees and other stakeholders, and link antifraud efforts to other risk management activities, if any.
- > See A Framework for Managing Fraud Risks in Federal Programs at https://www.gao.gov/assets/gao-15-593sp.pdf for additional information.

Idaho has a framework in place to mitigate fraud risk in the UI program. This framework includes a proactive approach to preventing fraudulent activity before benefits are paid on a claim or before an employer account is established. Preventing fraudulent activity is balanced with paying benefits when due and in a timely manner. Idaho utilizes a combination of queries, data analytics, crossmatches, and investigations to identify fraudulent activity within the program, as detailed below. Additionally, an integrity task force meets quarterly to review suggestions, process improvements, and system enhancements to reduce improper payments and improve recovery efforts on benefit overpayments and tax delinquencies. Idaho has dedicated Bureau with a primary responsibility for identifying fraudulent activity; however, Idaho has adopted the philosophy that integrity is everyone's responsibility. Staff members are trained and encouraged to report suspicious activity. Although Idaho has framework in place, the Pandemic and the multiple fraud schemes since, have highlighted the importance of remaining vigilant and agile in responding to ever changing fraud activities. Idaho recognizes more can be done in this area and plans to utilize the UI IT modernization grant to enhance the current systems to further identity, refine, prioritize, and address potential fraud across all areas of the UI program.

- State use of tools, services, strategies, process improvements, and/or procedural changes adopted by the state to combat fraud, verify identities, and enhance recovery efforts. States must identify which tools, solutions, and service provider(s) are used in the state's fraud management operations, including but not limited, to the following areas: data analysis, risk-based ID verification, fraud prevention and detection, and cybersecurity.
 - Include strategies, solutions, and/or activities using funds the Department has made available to states for combatting fraud and strengthening UI program integrity under UIPL Nos. 28-20; 28-20, Change 1; 28-20, Change 2; 28-20, Change 4; 22-21; 11-23; and 02-22.
 - Idaho was able to utilize funds from previous grant opportunities to support staffing as well as modernization to programs that will now require less staff intervention. Idaho has also utilized the funding to pay ongoing subscription costs for identify verification through our trusted vendor, IDme.
 - Provide details on overpayment recovery efforts including:

- Actions with banks, financial institutions, and with Federal law enforcement's forfeiture and seizure efforts.
 - Idaho conducts recovery efforts internally. Recovery of overpayments includes lien filing and bank seizures. Idaho also maintains communication with banking institutions on potential fraudulent activity, unused or misused benefit payment cards, and recovery of UI benefits from those cards. Idaho also responds to requests from law enforcement as quickly as possible.
- Information on how the state is using waivers of recovery of overpayments both for regular UI and temporary UC programs created by the CARES Act, including if the state is using approved blanket waivers as described in UIPL No. 20-21, Change 1.
 - Idaho continues to review waivers on a case-by-case basis and waive overpayments that meet the criteria established by federal and state guidance. Idaho utilized blanket waivers several times over the previous 2 years for scenarios described in UIPL 20-21, Change 1.
- How the state is using the Treasury Offset Program (TOP) for benefit overpayment recovery, how the state is ensuring covered debts are being submitted, and any barriers/challenges in working with TOP.
 - Idaho has utilized the TOP system for recovery of overpayments for many years. Idaho has checks and balances in place, as well as software, to detect any issues with the submission or receipt of TOP related information. Idaho does not have any barriers in this area.
- State use of UI Integrity Center resources, with a particular focus on state connection to the Integrity Data Hub (IDH) and use of its datasets to cross-match unemployment compensation (UC) claims and aid in the prevention and detection of fraud and improper payments (see Training and Employment Notice (TEN) No. 24-21);
 - Discuss the state's connection to the IDH, including frequency of IDH use.
 - Does the state submit all initial and continued claims for IDH cross-matching? If
 not, what is preventing the state from sending all claims?
 Idaho has incorporated IDH into an internal application, Fraud Finder.
 Initial and continued claims are cross-matched withing Fraud Finder using a
 variety of data, including IDH, and checked on a daily basis.
 - If the state is not connected to the IDH and/or is connected but not regularly submitting UI claims data through a webservice/real-time connection to IDH, provide details on the state's plan for how to increase usage and an anticipated timeline to:
 - Connect to the IDH.
 - Increase frequency of IDH use.
 - Fully leverage all available IDH capabilities. IDH capabilities include:
 - Suspicious Actor Repository (SAR)
 - o Multi-State Cross-Match (MSCM)
 - o Identity Verification (IDV)
 - o Bank Account Verification (BAV)

- o Fraud Alerting
- o Foreign Internet Protocol (IP) Address Detection
- o Suspicious Email Domains and Patterns
- Update the IDH connection to a webservice/real-time connection.
- Identify barriers to using any of the available IDH capabilities.

 N/A: Idaho utilizes the IDH and does not have any barriers in this area.
- If the state has not executed IDH Participation Agreement Version 5.0 (see TEN No. 24-21), provide details on the anticipated timeline to update to IDH Participation Agreement Version 5.0.

N/A: Idaho has a participation agreement with IDH.

- Discuss the state's use of the UI National Integrity Academy's virtual trainings and/or eLearning lessons.
 - Idaho incorporated the UI National Integrity Academy's training into the regularly scheduled training for staff and managers.
- Discuss the state's use of UI Integrity Knowledge Exchange Library resources, including the Behavioral Insights Toolkit (*see* TEN No. <u>15-21</u>).
 - Management and front-line staff have access and are able to research items within the UI Integrity Knowledge Exchange Library. Idaho is incorporating several ideas from the behavioral insights toolkit including a wage calculator and prompts throughout the claim process.
- Discuss the state's participation in State Consultative Services.
 - Idaho participated in the Tiger Team Consultative Services and is in the process of implementing suggestions, including behavioral insights and wage calculator.

Note: The IDH Team has a one-page dashboard report for each state summarizing current IDH utilization and areas where IDH use might be expanded. Please reach out to IDHTeam@naswa.org to request a copy of your state's IDH utilization dashboard report.

- State use of required and recommended integrity controls and overpayment recovery activities as outlined in <u>UIPL No. 11-23</u>, including any additional effective cross-matching and overpayment recovery activities and identified best practices.
 - Provide details regarding the state's use of each cross-match/integrity control and overpayment recovery activity (required and recommended) as outlined in <u>UIPL No. 11-23</u>. Include details on the frequency of crossmatch/integrity controls use (*e.g.*, conducted on all initial claims, all continued claims, only when suspicious activity is identified?) and frequency of overpayment recovery activities.
 - Cross-matches/integrity controls and recovery activities include:

Cross-matches/Integrity Controls

• ID Verification; Conducted on all new claims, continued claims, and weekly certifications.

- National Directory of New Hires (NDNH); Conducted quarterly.
- Quarterly Wage Records Cross-match;
 Conducted weekly.
- Systematic Alien Verification for Entitlement (SAVE); Conducted on all new claims.
- Referral of allegations reasonably believed to constitute UC fraud, waste, abuse, mismanagement, or misconduct to DOL-OIG;
 Idaho will refer when cases arise meeting these criteria.
- UI Integrity Center's IDH; Monitored daily.
- Digital Authentication, such as Multifactor Authentication (MFA); Built into all aspects of the claim filing and weekly certification processes. Claimants must pass ID.me each time they file an initial claim, log into our claimant portal or do their weekly certification. For claimants who are unable to do the ID.me process, we verify their identity in person.
- Device Fingerprint/Reputation Management; Idaho does not participate in this activity. Idaho employs other methods for verifying identity prior to issuing benefits. There are currently no plans to implement this integrity control.
- Fraud Risk Scoring (i.e., Case Management Prioritization); Idaho utilizes fraud risk scoring within our Fraud Finder application. A dedicated team reviews activity in Fraud Finder on a daily basis.
- Comparisons and cross-matches that detect shared characteristics;
 Comparisons are conducted within our Fraud Finder application. A dedicated team reviews activity in Fraud Finder on a daily basis.
- Social Security Administration cross-matches (*i.e.*, Unemployment Insurance Query (UIQ), Prisoner Update Processing System (PUPS), Death Master File); Conducted weekly
- Federal, state, and local incarceration cross-matches; Conducted weekly
- Deceased Records cross-matches;
 Conducted weekly
- Vital Statistics cross-matches;
 - Idaho utilizes vital statistics data for the deceased records crossmatch.
- State Directory of New Hires (SDNH);
 Conducted weekly.
- Department of Motor Vehicle cross-match; Conducted weekly.
- Interstate Benefits (IB) cross-match;
 Conducted manually. Idaho has plans to automate this process within the next FFY.
- State Identification Inquiry (SID) and IB8606 enhancements made to the Interstate Connection (ICON) network cross-match to prevent concurrent claim filing in multiple states;

 Conducted manually. Idaho has plans to automate this process within the

Conducted manually. Idaho has plans to automate this process within the next FFY.

- Use of a unique identifier to identify claimants instead of using the full SSN;
 Idaho uses a unique identifier for all claimants that does not include the full SSN.
- All claimants and claims are assigned a unique identifier that is not their SSN.
 Idaho uses a unique identifier on all claimants and claims that is not the SSN.
- Fictitious employer cross-matches;
 Conducted daily
- Periodic IT security assessments and audits consistent with National Institute of Standards and Technology (NIST)-compliant information technology security guidelines;
 - Idaho completes annual audits for SSA and IRS against its computer environments. Both annual audits are conducted using the NIST framework.
- Adequate internal controls to protect the integrity and security of state assets;
 Idaho has made significant investments in the Information Security
 technologies to monitor, detect, report and prevent on security threats in the
 Idaho Department of Labor computer environment. These technologies
 include, SIEM, EDR, email gateway, vulnerability management, firewall,
 data security and other platforms to ensure the security of the computer
 environment and data.
- Implement a cross-functional integrity task force to develop and implement state-specific action plans to reduce UI improper payments..
 Idaho has an integrity taskforce that meets quarterly to discuss suggestions on integrity-related issues and to implement processes, procedures, and other action plans to increase the integrity of the UI program and reduce improper payments.

Overpayment Recovery Activities

- Benefit Offsets;
- TOP;
- Cross Program Offset Recovery Agreement (CPORA);
- Interstate Reciprocal Offset Recovery Arrangement (IPORA);
- Negotiating repayment plans;
- Accepting repayments through various methods (e.g., online, via debit/credit card);
- State Income Tax Offset Program;
- Wage garnishments;
- Property liens and assessments;
- Active participation in probate and/or bankruptcy proceedings;
- Skip tracing;
- Work proactively and collaboratively with banks and financial institutions;
- Civil actions;
- Penalties and interest on overpayments in compliance with state and federal law;
- Implementing a voluntary fraud self-disclosure program;

Idaho participates in all of the above overpayment recovery activities.

• State/federal prosecution;

Idaho is working with the Idaho Attorney General's Office and expects cases submitted to proceed to prosecution in FFY 2024

• Offsets of lottery winnings, homestead exemptions, and other benefits;

Idaho has discussed this option, but does not have immediate plans to implement offsets of lottery winnings, homestead exemptions, and other benefits.

• Credit bureau referrals;

Although Idaho does not directly report to the credit bureaus, liens are filed against outstanding overpayments. Those liens are then reflected on the credit bureau reports.

- Collection agency referrals;
 Idaho conducts collection activities internally and does not refer delinquencies to a collection agency.
- Other recovery methods as determined by state law or policy.

 None
- Identify any additional integrity controls or recovery activities the state uses that are not listed in UIPL No. 11-23.

Idaho utilizes CAPTCHA in instances of high-level traffic to assist in the prevention of brute force attacks

• Provide promising practices.

Idaho takes a proactive approach to preventing fraud and makes all attempts to throughout the claim and weekly certification filing process to verify identify and educate claimants on proper reporting. Specific to fraud, Idaho supplies each claimant with a claim pamphlet talking about fraud, regularly emails notices to claimants about fraud, and provides information on various screens throughout the claim filing process on fraud.

• Identify challenges with cross-matches or in overpayment recovery activities.

Idaho utilizes a variety of cross-matches and risk scoring within the Fraud Finder program. Idaho also conducts overpayment recovery activities in-house. The workload brought on by the Pandemic and staffing limitations have been Idaho's biggest challenges.

• If the state does not currently use one of the integrity controls or recovery activities listed in <u>UIPL No. 11-23</u>, provide the state's plan and anticipated timeline to request and obtain access to the cross-match/integrity control or to implement the overpayment recovery activity.

Integrity activities not employed in Idaho's processes are discussed in the "Crossmatches/Integrity Controls" section.

Note: If the state does not plan to obtain access to a cross-match/integrity control or implement a specific recovery activity, please explain.

- State use and employer participation in State Information Data Exchange System (SIDES) (see TEN No. 12-16).
 - Provide details on the state's current usage of SIDES.

The Department has recently started an outreach campaign, contacting employers who return paper statements to see if they are interested in signing up for the SIDES separation exchange. This will increase our SIDES participation rate. Additionally, as part of the Tiger Team initiative, the Department plans to pursue implementing three additional exchanges: Determinations and Decisions, Monetary and Potential Charges, and Earnings Verification. We will also be implementing a single sign-on, connecting our employer portal to SIDES.

- If the state does not currently use all available SIDES exchanges, provide the state's plan for how to connect to all SIDES exchanges and an anticipated timeline to implement each SIDES exchange. Sides Exchanges include:
 - Separation Information
 - Monetary & Potential Charges
 - Additional Fact-Finding
 - Determinations & Decisions
 - Earnings Verification
 - Benefit Charges

Idaho utilizes SIDES and has plans to review each of the exchanges to determine if/where process improvements or efficiencies can be made.

- Identify any barriers to SIDES exchange participation, either in state promotion or in employer adoption.
 - Idaho does not currently have any barriers to SIDES participation.
- State strategies designed to facilitate claimants' compliance with state work search requirements while also supporting their reemployment such as adoption of the work search requirements in the Model Work Search Legislation (see TEN No. 17-19).
 - Outline the state's work search requirement and explain state challenges with work search improper payments.

Idaho requires the claimant make a minimum of two contacts per week and report details of those contacts when filing their weekly certifications. For those claimants returning to work for an employer, the claimant must maintain

contact with the employer and return to work when scheduled. The claimant self-reports on their weekly certification whether they met this requirement.

Discuss the state's plan to improve work search compliance by reducing work search errors and strengthening reemployment.
 Idaho continues to utilize online systems requiring claimants to report work search activities on a weekly basis, including providing the contact's name and phone number. Idaho educates claimants on the work search requirements throughout the claim filing processes as well as through an online handbook available at any time to the claimant. Re-employment Services and Eligibility Assessment (RESEA) interviews are conducted on a weekly basis for claimants selected for these services. FAQs related to work search are also available on our website. Idaho is looking at the feasibility of expanding the verification of work search activities beyond the current levels.

Our claim center staff and navigators verify work search contacts outside of the normal BAM process. A key week is selected, and claims staff review the work search for the key week as well as any other weeks claimed. They may reach out to the claimant for more details and/or contact the employer. In many cases, this is as much about education on an adequate work search, as it is a consequence for failing to look for work. Approximately 150 claimants have their work search reviewed each month through this process.

- (Topic #2) State plans and actions to address the state's top three improper payment root causes in Payment Integrity Information Act (PIIA) 2022.
 - Identify the state's top three improper payment root causes.
 Idaho's top 3 root causes are 1) benefit year earnings, 2) work search, and 3) separation issues.
 - Explain the state's challenges in reducing improper payments in the top three root cause categories.
 - 1. Benefit year earnings: claimants misunderstand proper reporting. The claimant may report hours worked and their rate of pay and assume the Department will calculate their earnings for them. Claimants also attempt to conceal earnings in an attempt to obtain some, or more, benefits for a given week (fraud).
 - 2. Work Search: claimants fail to accurately report their work search activities because they feel they are improperly coded as work seeking versus returning to an employer or assume the Department will not follow up to verify work search contacts. Claimants also fail to conduct work search activities or misreport those activities knowing they will not receive benefits fi they report properly (fraud).

- 3. Separation issues: claimants don't update their work history because they do not have the separation information at their disposal when they file or they fail to recall working for an employer. Claimants also fail to report separations on their initial claim and weekly certifications in an attempt to receive benefits (fraud).
- Discuss the state's plan to reduce improper payments in each root cause category. Idaho's integrity task force meets quarterly to discuss improper payment rates, root causes, and associated processes and procedures. There are no changes to the current strategies. As viable recommendations are made, Idaho will determine the feasibility of the recommendations and develop a plan for implementation. Prior recommendations have proven successful in reducing Idaho's improper payment rate. Idaho expects the integrity task force to continue to identify areas for improvement and efficiency.
 - 1. Benefit year earnings: Idaho participated in the Tiger Team Initiative and addressed this topic through that process. Idaho is in the process of implementing a wage calculator on the continued claim report to assist with calculation of a claimant's gross earnings. Additionally, prompts from the Behavioral Insights toolkit will be added throughout the claim and weekly certification process to improve claimant compliance. Idaho will continue to utilize crossmatches to identify and investigate potential fraudulent reporting.
 - 2. Work search: Idaho continues to educate claimants on proper reporting requirements throughout the claim filing processes as well as through an online handbook available at any time to the claimant. Suggestions, including IT modernization, will be discussed at future task force meetings.
 - 3. Separation issues: Idaho conducted intensive staff training during the summer of 2023. The training included the identification and resolution of separation issues. Staff are now better equipped to identify and address separation issues. The task force is also exploring ways to educate and dissuade claimants from fraudulent reporting, including prompts and written notifications.
- (Topic #3) State coordination and collaboration with the DOL-OIG and other state and Federal law enforcement agencies to investigate and prosecute UI fraud and recover overpayments. This should also include state plans to continue providing all confidential UC information to DOL-OIG for purposes of both investigating fraud and performing audits.
 - Idaho coordinates and collaborates with other state and federal agencies, including the DOL-OIG. Idaho attempts to provide any necessary UC information immediately upon request from the OIG for purposes of investigations and audits. Idaho also works with the State of Idaho Attorney General's office and with local, state, and federal law enforcement agencies to investigate and address fraudulent activity. This year, a representative from the US Attorney's office, located in Idaho, will present to UI

benefit, BPC, Tax Audit, and management staff on what is being seen at the federal level as well as how Idaho can help detect fraudulent activity.

- (Topic #4) State plans to strengthen program integrity in UI tax operations, including current activities and plans to identify and prevent worker misclassification, State Unemployment Tax Act (SUTA) Dumping, and fictitious employer schemes, and development/use of effective employer audit strategies (i.e., use of remote audits).
 - ➤ Identify current activities and plans to address:
 - Worker Misclassification: Idaho combines data mining, staff contact, and discovery to identify and address worker misclassification. Various data mining queries assist in identifying high non-compliant industries and creating the staff workload. Staff members, both within and outside the UI Tax program, can document suspicious activity and contacts with employers or workers. These are flagged for further investigation by tax personnel. Idaho also conducts discovery for misclassified workers through investigation of unregistered businesses and through regular communication with other state agencies, exchanging information on potential non-compliance. Idaho utilizes the information provided by Internal Revenue Service to identify potential misclassifications. As with other states, Idaho experienced significant turnover during and after the Pandemic. For the FY2024, Idaho expects to implement quarterly meetings with staff and managers to address worker misclassification issues including case studies, analysis of current activities, and implementation of process and procedures to address misclassifications
 - SUTA Dumping

most effectively.

Idaho conducts a variety of internal and external checks on new accounts to identify potential SUTA dumping before an account is created. Any account self- reporting an acquisition and any account with a suspected acquisition is flagged for an investigation by tax personnel. Additionally, Idaho utilizes data mining on a quarterly basis to identify potential SUTA dumping on established accounts.

• Fictitious Employer Schemes Historically, Idaho has not seen a significant number of fictious account requests; however, in recent months, there has been an increase in activity in this area. Idaho conducts a variety of internal and external checks on new employer registrations to identify fictious employers prior to creating an account. Idaho has determined it most effective to take a proactive approach to this issue. This approach requires staff time and expertise in reviewing the applications before assigning an account. Idaho also provides limited access to the employer account creation software. Only those directly performing services in the tax operations area are able to authorize account creation. Any user, both within and outside the UI tax program, can identify and document suspicious activity (phone call, electronic, or in person contact) for investigation by tax personnel. Idaho will continue to conduct, at minimum, quarterly analysis and monitoring of the validation requirements for account creation. Frequent analysis is expected to assist in identifying the everchanging efforts of bad actors attempting to establish fictitious schemes in Idaho.

- Development/use of effective employer audit strategies (including, but not limited to, use of remote audits).

 Idaho currently incorporates remote audits as a strategy for meeting the desired levels of achievement in the audit program. From 2020-2022, Idaho experienced significant staff turnover and reassigned audit staff to address backlogs created by the Pandemic. As a result, most audits conducted during this time were remote audits. In FY2023, Idaho returned to a field audit program and utilized remote audits to supplement the field audit schedule and to assist with training. This is a return to a pre-Pandemic structure, which was proven to be a very effective strategy for Idaho in the past. This structure also allows Idaho to further monitor fictitious employer schemes and SUTA dumping by conducting on site reviews of records and verification of business existence. For FY2024, Idaho expects to refine data mining queries and audit workload to identify and address suspicious employer activity early in the life of the account.
- (Topic #5) State plans and actions to strengthen internal security and ensure that all appropriate internal controls and processes are in place and are adequate to assess internal risks and threats, ensure program integrity, and minimize program vulnerabilities (see UIPL No. 14-17).
 Idaho is in compliance with the criteria outlined in UIPL 14-17 and has adequate internal controls in place. Additionally, all staff and vendors with access to confidential UC information must fill out a nondisclosure agreement. This year, the Department is beginning the process of requiring background checks of all staff with access to confidential information. For all items involving payment, multiple parties are involved before issuing payment to make sure there is a clear separation of duties. Our claims center and Compliance unit both operate behind locked doors, requiring key card entry by Department or contracted staff only.
- (Topic #6) State plans and actions to evaluate the effectiveness and equity of fraud prevention and detection, ID verification, and improper payment reduction activities. State should include strategies to ensure that processes used to detect and prevent fraud are effective and do not limit the ability for a legitimate claimant to apply for and become eligible for UC. States implementing or using facial recognition technology in their ID proofing processes must also report findings from bias testing and provide updates on efforts to mitigate biases or barriers in this section of the IAP.

- Identify potential barriers that are created by fraud prevention and detection functions for legitimate claimants. Provide plans and actions designed to mitigate such risks.
 - Anytime there is a focus on preventing and detecting fraud, there is the risk that a legitimate claimant will be flagged inappropriately. Idaho has a Discovery team that reviews claim activity on a daily basis, as part of their priority workload. In addition to fraudulent activity, they are also looking for false positives. When false positives are detected, the Department works closely with ID.me and/or the adjudication staff, to confirm identification and release any other incorrectly flagged issues.
- As required in <u>UIPL No. 11-23</u>, states must ensure there is at least one timely, effective, and accessible non-digital alternative to online ID verification, which should not be overly burdensome on applicants, limit access to public benefits programs or the timely receipt of benefits, or stigmatize members of the public in any way. Provide details on the state's non-digital ID verification option(s).
 - For claimants who are unable or unwilling to utilize the ID.me process, we verify their identity in person at our one stop centers by having them submit copies of driver's licenses and social security cards. Representatives are available to discuss the requirements and assist the claimant in-person through this process.
- Include how the state flags cases for suspected fraudulent activity and how investigation resources are assigned, including:
 - What risk scoring elements and/or prioritization elements are used.
 Idaho uses IDH for risk scoring elements such as matching against multistate claim and SAR, and name or DOB mismatch. Idaho also uses an internal Fraud Finder application for reviewing risks such as suspicious IP addresses, bank accounts, and multiple addresses.
 - How the risk scoring elements and/or prioritization elements are weighted.
 Idaho uses IDH scoring elements for prioritization.
 - How the state evaluates the weights based on false positives and negatives.
 Idaho evaluates each one on an individual basis for validity.
 - How risk scoring elements and/or prioritization elements are updated.
 Idaho uses the webservice with IDH to ensure all elements are updated.
 - How the state ensures the fraud risk scoring and/or prioritization of cases does not negatively affect legitimate claimants.
 - Idaho individually reviews each one and only the claims that are suspicious or potentially fraudulent are flagged in the system. Claimants that are currently filing are prioritized in an effort to reduce the amount of any improper payments.
- Include details on how the state measures claimants' usage of both digital and nondigital identity verification options, how the state reviews digital services for false

positive and false negatives, and how the state ensures legitimate claimants have alternative paths to prove their identity and/or resolve issues, including providing a possible recourse.

Identify verification starts with Idaho's partnership with ID.me, our trusted authentication vendor. Claimants must pass ID.me each time they file an initial claim, log into our claimant portal or do their weekly certification. Idaho is able to monitor the use of IDme services at will. In addition to IDme, Idaho monitors activity and conducts crossmatches in our Fraud Finder application. Claims that indicate a potential false positive are manually reviewed by staff. Idaho has staff members available to answer the phones lines throughout the workweek to answer questions, address issues, and provide guidance on the claim filing process. Claimants who are unwilling or unable to utilize digital ID verification are able to verify in-person if they choose.

- (Topic #7) State plans and actions to mitigate negative consequences for victims of UI ID fraud, including ensuring simplified processes to remove the victim's liability for overpayments resulting from ID fraud.
 - ➤ Include details regarding how the state provides a reporting mechanism for UI ID fraud on their websites, communicates status updates for such investigations, and takes action to protect the victim when the state determines that UI ID fraud has occurred (see <u>UIPL No. 11-23</u> for more details on protecting victims of ID fraud).
 - Idaho has a website that allows individuals to provide tips on UI fraud, including reporting ID fraud. Idaho also has dedicated phone staff that are able assist with individuals reporting ID fraud and with victims of ID fraud. Idaho has an offline system that allows victims of ID fraud to securely file for and receive UI benefits. The offline system requires manual intervention when filing the initial claim and each weekly certification. This provides an added layer of oversight and security for those individuals that were victims of identity theft. It also allows Idaho to accurately track weekly certifications and payments made to the victim separately from those associated with a bad actor.
 - ➤ Include the state's procedures for mitigating negative impacts on the UI ID fraud victim (e.g., establishing a pseudo claim record, temporarily marking the overpayment as "uncollectible", etc.).

 When Idaho is confident that a claimant is a victim of identity fraud, Idaho will withhold fraudulent information from overpayments and Form 1099-Gs. Idaho codes the overpayment as uncollectable for the victim of the fraud.
- (Topic #8) If the state has not provided complete and accurate overpayment reporting on the ETA 227 reports (Overpayment Detection and Recovery Activities), and the ETA 902P report (Pandemic Unemployment Assistance Activities), the state must provide information on plans for improvement, including timeframes and milestones,

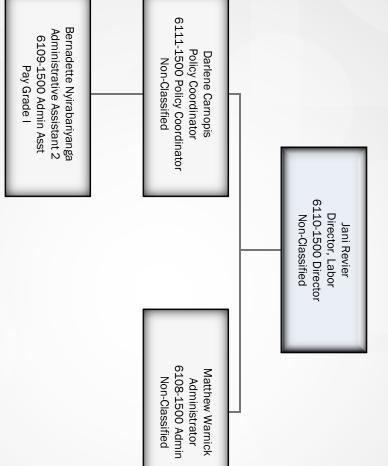
for addressing the issue and ensuring complete, accurate, and timely reporting in FY 2024.

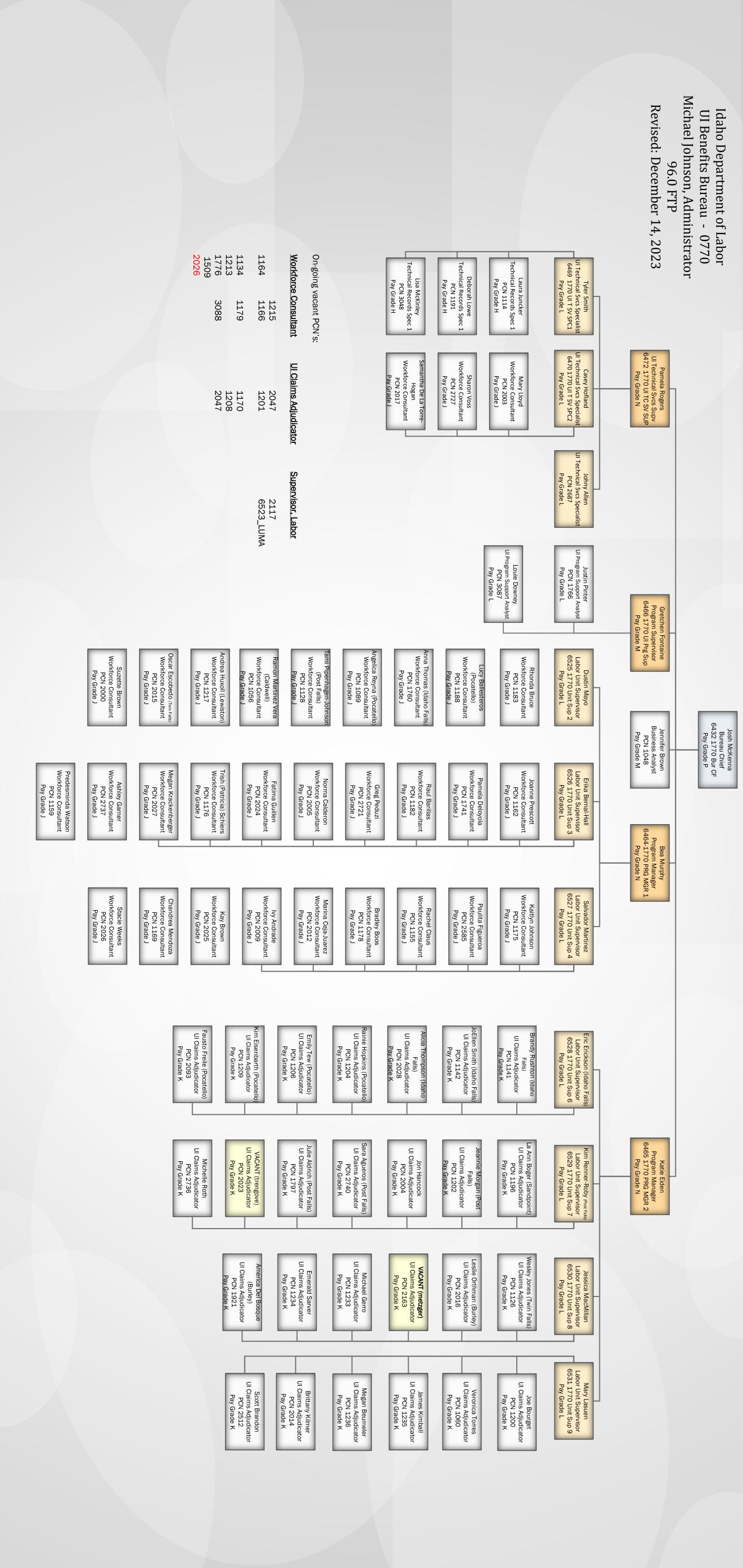
- ➤ If the state has submitted all data for the ETA 227 or 902P reports, this section is not applicable, and the state can input "N/A".
- ➤ N/A: Idaho has submitted all ETA 227 and 902P reports. Idaho will focus on data validation during FFY 2024 and will review reports throughout that process to verify accuracy. If deficiencies are identified, Idaho will take steps to correct the deficiencies and submit amended reports as quickly as possible.

(6) Organizational Chart: The organization chart must conform to the requirement for delivery of service through public employment offices, or such other designated providers as the Secretary may authorize; show the State's configuration from the Governor of the State down to the point of Employment Service and UI customer service delivery; and provide sufficient detail to show each organizational unit involved and the title of the unit manager.

See Idaho's FY24 UI Related Organizational Charts on the following page.

Idaho Department of Labor Director's Office - 0500 4 FTP Revised: August 18, 2023





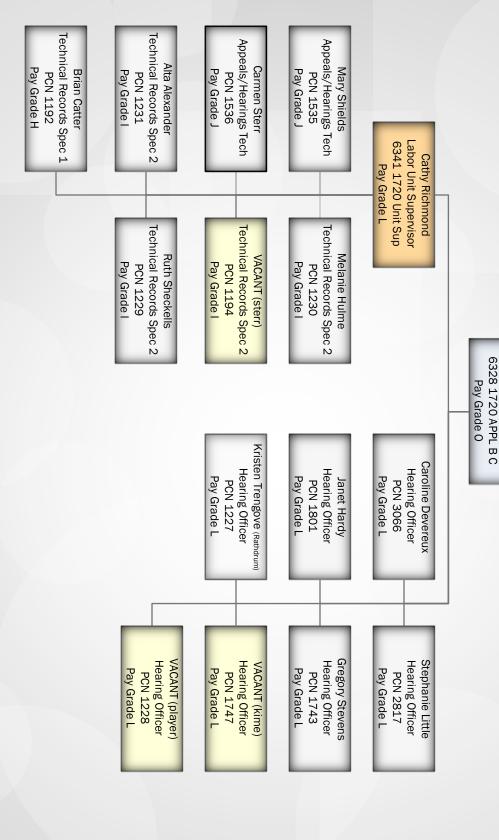
UI Compliance Bureau - 0760 Michael Johnson – Administrator

89.0 FTP

JoAnna Henry Bureau Chief 6342 1760 1910 BC Pay Grade P Idaho Department of Labor

Idaho Department of Labor Appeals Bureau – 0720 Michael Johnson – Administrator 16.0 FTP Revised: November 30, 2023

Rick Langford Appeals Bureau Chief



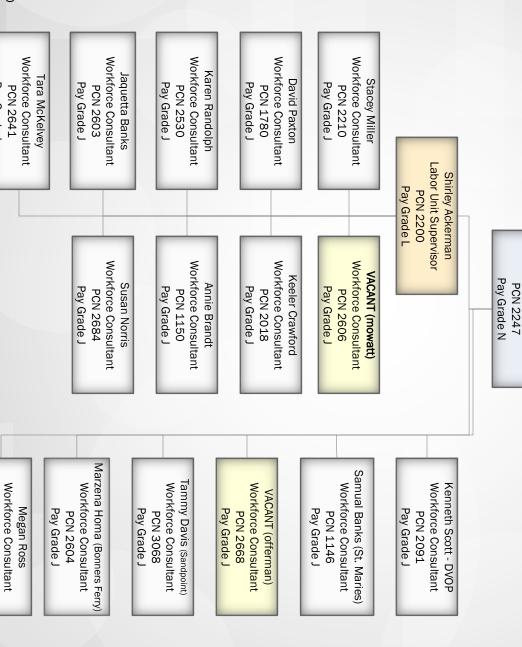
Idaho Department of Labor Region 1 Local Offices Kristyn Carr, Administrator Kellye Sharp – Area Manager 18.0 FTP

Revised: December 14, 2023

Manager, Labor

Dave Darrow

Post Falls

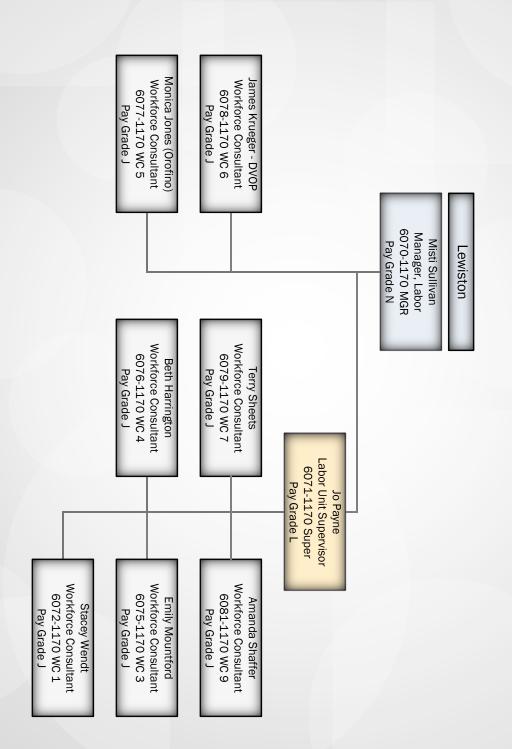


Pay Grade J

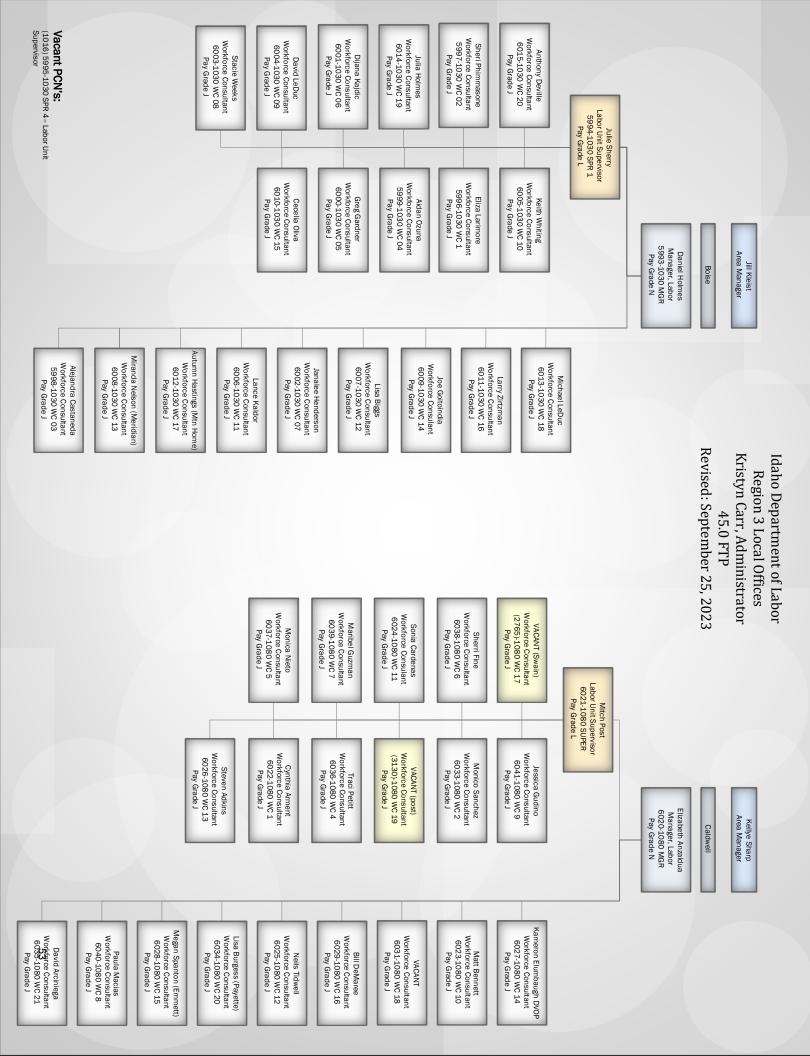
Pay Grade J

PCN 1144

Idaho Department of Labor Region 2 Local Office Kristyn Carr – Administrator Kellye Sharp, Area Manager 12.0 FTP Revised: December 14, 2023

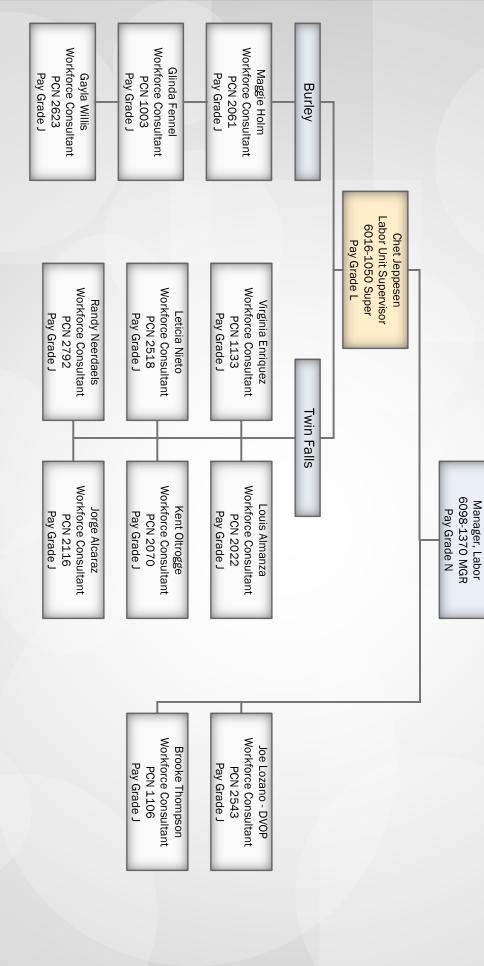


On-going Vacant PCN's: (2609) 1170 WC 8 Workforce Consultant (2806) 1170 WC 10 Workforce Consultant (1145) 1170 WC 2 Workforce Consultant



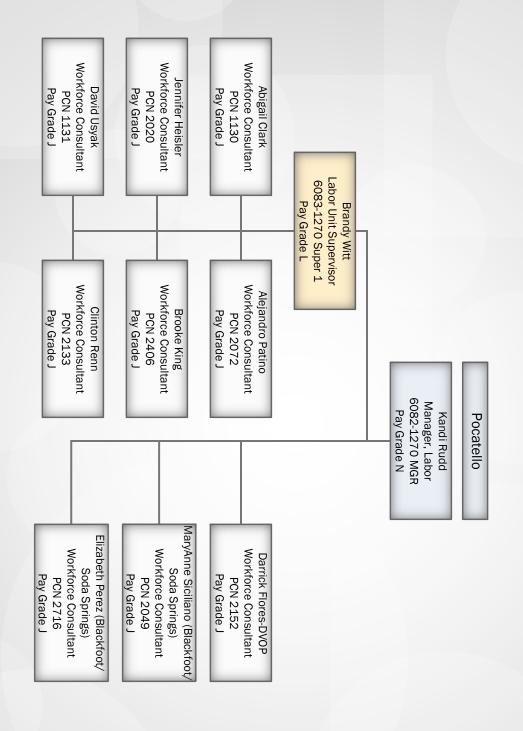
Idaho Department of Labor Region 4 Local Offices Kristyn Carr, Administrator Jill Kleist – Area Manager 14.0 FTP Revised: September 25, 2023

Megan Beyer

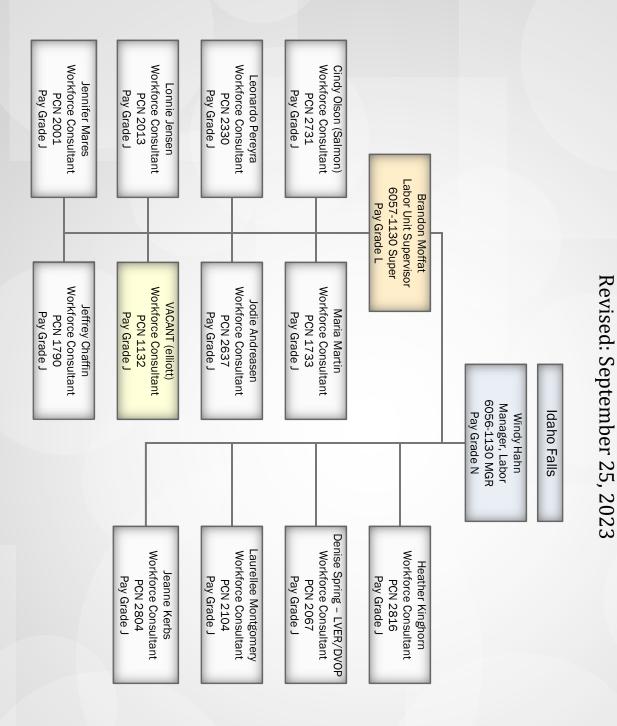


On Going PCN's 1803 – Labor Unit Supervisor

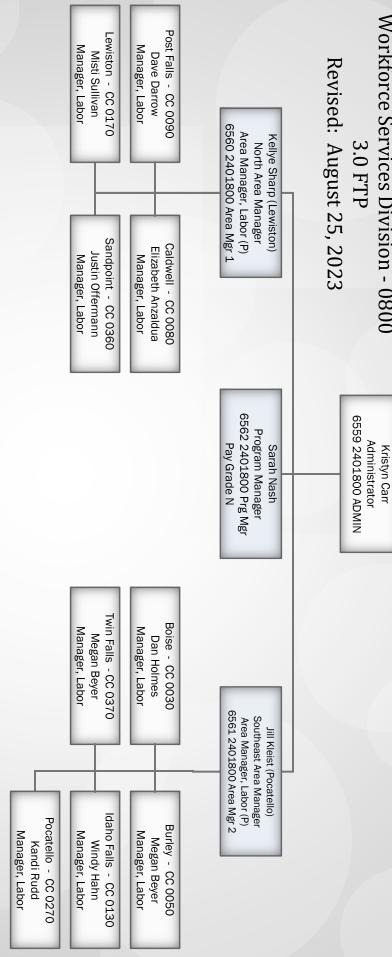
Idaho Department of Labor Region 5 Local Offices Kristyn Carr, Administrator Jill Kleist – Area Manager 11.0 FTP Revised: November 1, 2023



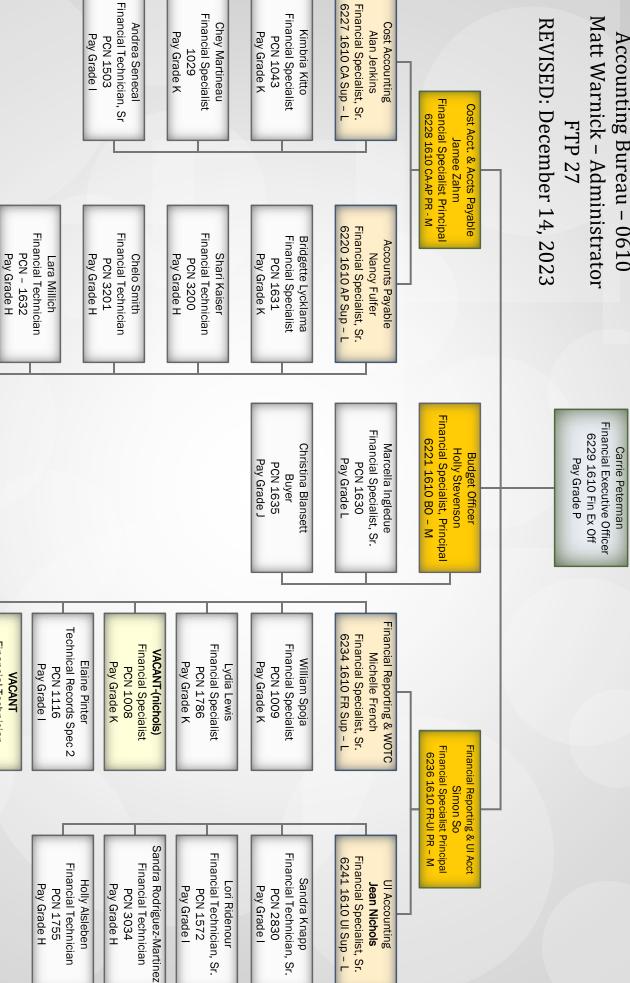
Idaho Department of Labor Region 6 Local Offices Kristyn Carr, Administrator Jill Kleist – Area Manager 14.0 FTP



Workforce Services Division - 0800 Idaho Department of Labor 3.0 FTP Kristyn Carr



Matt Warnick - Administrator Idaho Department of Labor Accounting Bureau - 0610 **FTP 27**



Financial Technician

Pay Grade H PCN 3202 Joline MacDonald

Financial Technician

PCN 1036

Pay Grade H

(7) *SQSP Signature Page*. The State administrator must sign and date the SQSP Signature Page. By signing the Signature Page, the State administrator certifies that the State will comply with all the assurances and activities contained in the SQSP guidelines.

See Idaho's FY24 SQSP Signature Page on the following page.

U.S. Department of Labor SQSP SIGNATURE PAGE

OMB Control No.: 1205-0132 Expiration Date: 02/29/2024 FEDERAL FISCAL YEAR **STATE** U.S. DEPARTMENT OF LABOR Employment IDAHO **FFY 2024** and Training Administration UNEMPLOYMENT INSURANCE STATE QUALITY SERVICE PLAN SIGNATURE PAGE This Unemployment Insurance State Quality Service Plan (SQSP) is entered into between the Department of Labor, Employment and Training Administration, and **IDAHO DEPARTMENT OF LABOR** (NAME OF STATE AGENCY) The Unemployment Insurance SQSP is part of the State's overall operating plan and, during this Federal fiscal year, the State agency will adhere to and carry out the standards set forth in Federal UI Law as interpreted by the DOL, and adhere to the Federal requirements related to the use of granted funds. All work performed under this agreement will be in accordance with the assurances and descriptions of activities as identified in the SOSP Handbook and will be subject to its terms. TYPED NAME AND TITLE SIGNATURE DATE Jan 1 11/6/2023 JANI REVIER, DIRECTOR STATE ADMINISTRATOR (print name) DOL – REGIONAL OFFICE APPROVING OFFICIAL (print name) DOL – NATIONAL OFFICE APPROVING OFFICIAL (print name)

(if required)

Though a State needs to submit the complete SQSP package on a 2-year cycle, there are certain documents contained in the SQSP package which are required to be submitted by States annually as part of the off-year submission. The documents which are required to be submitted annually are considered a modification to the complete SQSP submitted the previous year. Since funds for State UI operations are appropriated each year, each State is required to annually submit the transmittal letter, budget worksheets, organizational chart and the signature page. The modification may also include CAPs for new identified performance deficiencies, and any required modifications to existing CAPs.

Since the UI program is a required one-stop partner, States have the option of including UI in the Combined State Plan authorized by WIOA sec. 103.

- (b) <u>Requirements for States electing to include UI in the Combined State Plan</u>: States that elect to include UI in the Combined State Plan must:
 - (1) Submit an SQSP in the following manner depending on their timing in the SQSP cycle: (A) If a State is in the first year of their 2-year cycle, , the State is required to submit the most recently approved complete SQSP package. A complete SQSP package will include the Transmittal Letter, Budget Worksheets/Forms, State Plan Narrative, CAPs (including the milestones and the completion date for each milestone), the UI IAP, Organizational Chart, and the SQSP Signature Page. One of the key goals for the UI program is to ensure that claimants are able to successfully return to work. As such, the SQSP State Plan Narrative must provide a discussion of the plan coordination with other WIOA Combined Plan programs to ensure a coordinated effort and integrated service delivery.

Idaho is in the first year of the 2-year cycle as such the required documents are submitted in the appropriate sections.

(B)If a State is in the second year of the 2-year cycle, the State is required to submit the most recently approved complete SQSP package with a modification that must include the Transmittal Letter, Budget Worksheets/Forms, Organizational Chart, and the SQSP Signature page. The modification may also include CAPs for new identified performance deficiencies, and any required modifications to existing CAPs. The CAP must list both specific milestones for key corrective actions or improvement activities, and the completion date for each milestone.

Idaho is in the first year of the 2-year cycle as such the required documents are submitted in the appropriate sections.

(2) Submit the required off-year SQSP components as a modification to the Combined State Plan on the same cycle as the regular SQSP process which must be approved by September 30th each year.

Idaho is in the first year of the 2-year cycle as such the required documents are submitted in the appropriate sections.